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## MANAGEMENT OF AEROSOL CANS

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This fact sheet describes safe and environmentally sound management practices for aerosol cans generated in industry, commerce, at institutional facilities, and other non-residential sites. For information on how *homeowners* should manage *residential* aerosol cans, see the DEP website at [www.ct.gov/dep/WhatDoIDoWith](http://www.ct.gov/dep/WhatDoIDoWith).

Any non-residential generator of waste aerosol cans is subject to all applicable hazardous waste management regulations. Aerosol cans commonly have hazardous *contents* (e.g., solvents, pesticides), hazardous *propellants* (e.g. flammable gasses such as propane or isobutane), or *both*.

DEP urges generators to recycle aerosol cans whenever possible. Guidance on how to recycle aerosol cans is provided below. DEP's policy on aerosol can recycling is based on a September 17, 1996 EPA New England Region letter stating its position on aerosol can management.

### How must generators manage full or partially-full aerosol cans?

The generator must determine if either the contents of the can or the propellant are hazardous wastes. Information on the contents of the cans may be found in Material Safety Data Sheets, manufacture's product specification sheets, or from other sources (such as product labels). If either the contents of a discarded aerosol can or its propellant are hazardous, it must be managed as a hazardous waste. For more information on determining if an aerosol product is hazardous, see [DEP's Hazardous Waste Determination Fact Sheet](#).

Full or partially-full hazardous aerosol cans may be placed in a container and sent to a permitted hazardous waste recycling, treatment, or disposal facility. Alternatively, the hazardous contents and/or propellant may be removed from the aerosol cans, and the drained and depressurized can sent for scrap metal recycling as a non-hazardous waste. See below for more information on how to safely and properly empty full or partially-full aerosol cans.

### How must generators manage "empty" aerosol cans?

If an aerosol can is "empty" (i.e., all the liquid contents have been removed by spraying), the can may still contain hazardous propellant.<sup>1</sup> In particular, there may be enough propellant remaining in the can that it could be *reactive hazardous waste* (i.e., capable of exploding if heated under confinement). As a result, DEP is not at this time able to make a categorical determination as to whether various types of "empty" cans that may have contained a wide range of products are or are not reactive hazardous wastes. It remains the responsibility of the generator of any particular waste to make this determination (see [40 CFR 262.11](#) and [40 CFR 261.23](#)). **If the "empty" aerosol can remains reactive, it is a hazardous waste and must be managed as such.**

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<sup>1</sup> Aerosol products that contain "acute hazardous wastes" must be triple-rinsed in order to be considered "empty." Acute hazardous wastes include all wastes with EPA waste codes beginning with the letter "P" and include products such as certain pesticides. For more information on "P" wastes, see the [DEP web page entitled "What is Hazardous Waste?"](#)

However, a metal aerosol can that does not contain a significant amount of liquid would meet the definition of scrap metal ([40 CFR 261.1\(c\)\(6\)](#)), and thus would be exempt from RCRA regulations under [40 CFR 261.6\(a\)\(3\)\(ii\)](#) **if recycled**. Therefore, a determination of reactivity or any other characteristic would not be necessary if the “empty” aerosol can is recycled as a scrap metal.

### **Is the use of aerosol can puncturing devices considered treatment of hazardous waste?**

No, provided the puncturing is part of a *recycling process*. If aerosol cans are properly punctured and emptied prior to recycling the remaining metal portion as scrap metal, this activity would be exempt from RCRA treatment permit requirements under [40 CFR 261.6\(c\)](#), except as specified in [40 CFR 261.6\(d\)](#). Properly puncturing and draining aerosol cans means using equipment that is specifically designed and operated to:

- puncture the cans so that any liquid remaining in them may flow out (e.g., at either end of the cans);
- drain the cans (e.g., with punctured ends down), so that they no longer contain significant amounts of liquid; and,
- collect any hazardous vapors that may be released during puncturing, in devices such as in carbon filters.

In addition, these can puncturing activities should be conducted in accordance with manufacturer’s recommendations, DEP - Bureau of Air Management regulations, and any OSHA requirements including permissible exposure limits for personnel operating the aerosol can puncturing device. Several manufacturers make aerosol can puncturing devices that are specifically designed to meet the above requirements. Use of “jury-rigged” puncturing devices is strongly discouraged, and is likely to result in releases that may pose a fire or explosion hazard, or create a health hazard for workers.

### **How long may an “empty” aerosol can be stored on-site before going for recycling?**

Cans may not be stored on-site before recycling for more than one year from the date the accumulation of the cans began. If cans are “accumulated speculatively” (kept on site for more than one year), hazardous waste determinations must be performed on the cans, even if they are going for recycling. To avoid this, generators should institute best management practices to ensure that cans are not stored for more than a year.

### **How should generators manage liquid or contained gases from aerosol cans?**

Hazardous waste determinations must be performed on any contents or propellants removed from the aerosol cans to determine if they are subject to regulation as hazardous wastes. Also, any air filters or other similar devices that contain residues from the cans would be subject to hazardous waste determinations, and, if found to be hazardous, must be managed as hazardous wastes.

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This guidance document does not and is not intended to replace or supersede either Regulations of Connecticut State Agencies (RCSA), Sections 22a-449(c)-100 through 119 and 22a-449(c)-11 ([“Hazardous Waste Management Regulations”](#)) or the [Code of Federal Regulations Title 40 \(“40CFR”\), Parts 260 through 279](#). The State of Connecticut Department of Environmental Protection (“DEP”) advises the regulated community not to rely solely upon the information presented in this guidance document, but to read all applicable regulations set forth in both the Hazardous Waste Management Regulations and Title 40 CFR, Parts 260 through 279, and to keep informed of all subsequent revisions or amendments to these regulations.

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