

# Waste in the Work Place

## Non-manufacturing Waste



A business asked?

Are hand sanitizers hazardous waste?

# Types and Ingredients

- Liquid



- Lotion



- Aerosol



- Towel



- Alcohols (greater than 60% per CDC)
  - Ethyl alcohol
  - Isopropyl alcohol
  - Propyl alcohol
- Benzalkonium chloride
- Trichlosan
- Thyme oil

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Some aerosols use propane for the propellant

# How the Inspector's do it

Is the material a solid waste?



If yes,

Is the solid waste a hazardous waste

- Listed
- Characteristic

# What types of waste could be generated?

- Empty container
- Container with content
- Used material
- Spills

# 261.2 Table 1

	Use constituting disposal	Energy recovery (fuel)	Reclaimed	Speculative accumulation
Spent material	*	*	*	*
Sludge (listed in 262.31 or 32)	*	*	*	*
Sludge (exhibiting a characteristic of hazardous waste)	*	*		*
By-products (listed in 262.31 or 32)	*	*	*	*
By-products (exhibiting a characteristic of hazardous waste)	*	*		*
Commercial chemical products (listed in 262.33)	*	*		*
Scrap metal	*	*	*	*

# Which Solid Waste Description Applies?

- Spent materials
  - Used towels
- Commercial chemical products
  - Containers with content and spills
- Scrap metal
  - Empty metal containers (aerosol)

# Spent Materials

## Used towels

– Listed non specific source HW (261.31)

- Not listed



– Characteristic HW (261.21 – 24)

- Benzalkonium chloride, trichlosan, thyme oil based products
  - No RCRA characteristics
- Alcohol based products – **D001**
  - Ignitable (FP less than 140)
    - » 100 deg. F
  - (pass paint filter test - not D001)

# Commercial chemical products

## Containers with content and spills

- Listed commercial chemical products HW (261.33)
  - Not listed
- Characteristic HW (261.21 – 24)
  - Benzalkonium chloride, trichlosan, thyme oil based products
    - No RCRA characteristics
  - Alcohol based products – **D001**
    - Ignitable (flash point less than 140)
      - 77 deg. F for liquid
      - 89 deg. F for lotion
      - 100 deg. F for towels
  - Aerosols – **D001**
    - Flammable gas

# Scrap Metal

- Empty Metal Containers  
(provided no acutely hazardous materials)

- Scrap metal recycling
  - Recycling #1 and 2 plastic



#1 and #2 empty plastic containers  
are recyclable



# Questions/Comments

