

Aerosol containers **ARE** recyclable, just like any other empty steel container!

Given the public's concern about solid waste disposal, the aerosol industry teamed with the steel industry to promote the collection of empty aerosol cans in recycling programs nationwide. Thousands of communities now include aerosol container recycling in both household residential and curbside buy-back and drop-off programs.

**Most aerosol cans are made of steel.** Post-consumer cans (food, beverage, paint and aerosol products) are in demand because steel furnaces require recycled steel to make new steel. Today's steel aerosol cans contain an average of 28 percent recycled content.

Along with the can, both the cap and box are recyclable as well

**The following is a response from the United States Environmental Protection Agency Office of Solid Waste and Emergency Response regarding the disposal of aerosol cans.**

### **RESIDENTIAL AEROSOL CANS**

First, I would like to emphasize that under the federal RCRA regulations, household waste (including aerosol cans) is excluded from the definition of hazardous waste (40 CFR 261.4(b)(1)). Thus, any aerosol cans generated by households are not regulated as hazardous waste. Because this exclusion attaches at the point of generation (i.e., the household) and combines to apply throughout the waste management cycle, household aerosol cans collected in municipal recycling programs and subsequently managed in recycling programs continue to be excluded from the hazardous waste management regulations.

The majority of used residential aerosol cans contain very little residual product or propellant. Along with working with many of the 600 or more communities currently recycling these cans, the data suggest that aerosol containers can be effectively recycled. The Agency does recommend that communities running residential steel recycling programs educate their participants to recycle only empty steel aerosol cans. Participants could also be educated to: 1) purchase only the amount of consumer products that they need to minimize the quantities of unused products, 2) give unused products to someone else who can use them, 3) take unused or partially full containers to a household hazardous waste collection program if available, or 4) dispose of the partially full containers as directed on the label.

### **COMMERCIAL/INDUSTRIAL AEROSOL CANS**

The remainder of this letter discusses only these non-household aerosol cans generated by commercial or industrial generators.

A steel aerosol can that does not contain a significant amount of liquid would clearly meet the definition of scrap metal (40 CFR 261.1(c)(6)), and thus would be exempt from RCRA regulation under 40 CFR 261.6(a)(3)(iv) if it were to be recycled. Aerosol cans that have been punctured so that most of any liquid remaining in the can may flow from the can (e.g., at either end of the can), and drained would not contain significant liquids.

It should be noted that since the process of emptying the aerosol cans is part of a recycling process (i.e., scrap steel recycling), this activity would be exempt from RCRA regulation under 40 CFR 261.6(c) (except as specified in 40 CFR 261.6(d)). The Agency recommends that these activities be conducted in a safe and environmentally protective manner and that care be taken

to properly manage any contents removed from the container (both liquids and gases). Any liquids or contained gases removed from aerosol cans may be subject to regulation as hazardous wastes if they are listed in Subpart D of 40 CFR Part 261 or if they exhibit any characteristics of hazardous waste as described in Subpart C of 40 CFR Part 261.

We have also been asked to determine whether used aerosol cans would meet the definition of "empty" under 40 CFR 261.7. Again, if the steel cans are being recycled, it is not necessary to determine whether they are "empty" under the criteria listed in 40 CFR 261.7. As long as an aerosol can being recycled does not contain significant liquids, the can is exempt as scrap metal. However, in order to dispose of a can as non-hazardous waste (rather than recycle it), a generator would have to determine that the can is empty under 40 CFR 261.7 (or that the product it contained was not hazardous), and that the can itself is not hazardous. If a can is to be disposed of, and either contains or is hazardous waste, it must be managed under all applicable regulations.

Please be aware that this letter addresses only the federal hazardous waste regulations. Authorized State agencies implement the RCRA program in their states (although some parts of the program may be implemented by the U.S. EPA Regions), and that state regulations may be more stringent than the federal regulations. Anyone managing aerosol containers should contact the appropriate state environmental agency or U.S. EPA Regional Office to determine how the regulations of that particular state will apply to their activities.

Another way to "Save The Earth" is to maximize your resources. Don't be wasteful. Remember, aerosol cans are sealed airtight, meaning the products inside have an extremely long shelf life. Use every last bit of spray paint or bug spray to get the full benefit and value from the can. Make sure the can is completely empty before you recycle it. Then simply follow the instructions for disposal printed on the can or pitch it into your recycling bin. Remember, the Earth appreciates every little effort you make.

For a list of recycling centers in your area that may accept aerosol cans, please visit [www.earth911.org](http://www.earth911.org).

If you should have any other questions regarding the recycling of the Seymour's aerosol products, please do not hesitate to contact us.