



WESTERN  
CONNECTICUT  
STATE UNIVERSITY

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AEROSOL CAN MANAGEMENT PLAN

PROCEDURE E-108

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Please direct any questions or comments about the applicability of this document to  
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#### 1.0 PURPOSE

The purpose of this procedure is to establish policy on the accumulation, collection, and processing of aerosol cans and their contents. According to the EPA, any can that did contain, or does contain, hazardous constituents that would be a “listed” or “characteristic” hazardous waste is subject to RCRA regulations unless the can is fully evacuated of its contents.

#### 2.0 SUMMARY OF APPLICATION

The State of Connecticut requires that all spent aerosol cans be collected and their contents managed in accordance with the Universal Waste Rule as adopted by the State of Connecticut (10/31/2000). According to section 22a-449(c)-113, aerosol cans are referred to as “low risk, high volume hazardous wastes” and subject to regulation as universal waste.

#### 3.0 SUMMARY OF FUNCTION

A designee of the Director of Environmental & Facilities Services collects the aerosol cans monthly from designated accumulation sites. An approved Aerosol Evacuation Device is used to puncture and drain compatible aerosol cans. The cans are sorted according to compatibility. Pesticide containing cans are lab packed separately. Once the segregation has been made, the designee determines whether the aerosol cans are still operational. If a can is still good, it will be recirculated for further use. If the can, however, is spent, it will be punctured, emptied, and disposed of. Using the Aerosol device, the designee presses on a handle that causes a puncture pin to pierce the can, which is secured inside a cylinder. The can’s contents are then collected in a drum and managed as hazardous waste. Any aerosol can that is completely emptied (i.e., does not contain propellant or product and is at atmospheric pressure) is not regulated as hazardous waste, per 40 CFR 261.7, even if it contained hazardous substances. Therefore, the evacuated cans will be placed into receptacles and recycled as scrap metal.

NOTE: Only cans containing compatible materials will be disposed of using the above mentioned procedure. All other cans will be lab packed.

#### 4.0 OPERATIONAL RULES

Authorized receptacles for aerosol cans (labeled 5-gallon buckets) are located in each building on the Midtown and Westside campuses. Cans can be accumulated at the designed areas until a determination is made regarding the operational status of each can.

Under no circumstances are aerosol cans allowed to accumulate or be stored outside of these labeled receptacles. A pick up certification from (Appendix 1) will be completed in order to document frequency of pollutions.

The designated rooms for the accumulation of aerosol cans are as follows:

Midtown Campus		Westside Campus	
Building	Room#	Building	Room#
Berkshire Hall	002	Ella Grasso Hall	Main Valve Room
Fairfield Hall	Custodial Closet Across From 104	O'Neill Center	Receiving (adjacent to gate 5)
Haas Library	Mechanical	WS Classroom Building	124 (time clock)
Higgins Hall	Fire Alarm Panel Room	A. Searle Pinney Hall	Loading Dock
Litchfield Hall	Mechanical Room	Westside Residence Hall	E034 Storage
Newbury Hall	Basement-Machine Room		
Old Main	021 Custodial Closet		
Police/Maintenance	Garage (near door)		
Student Center	008 Storage		
University Hall	Electrical Room		
Warner Hall	Room Across From 113		
White Hall	Main Valve Room (inside 031)		
Science Building	105 – Recycling		

Custodial Responsibilities

The custodial staff is required to place all spent aerosol cans into authorized receptacles in the room designated for the building they are working in.

Appendix 1  
 Pick Up Certification

<b>Midtown Buildings</b>		
Building	Room #	Date
Berkshire Hall	002 (storage)	
Fairfield Hall	1 <sup>st</sup> wing closet	
Haas Library	Mechanical	
Higgins Hall	Closet (basement)	
Litchfield Hall	Mechanical Room	
Newbury Hall	Basement-Machine Room	
Old Main	021(custodial storage)	
Police / Maintenance	Garage	
Student Center	008 (storage)	
University Hall	Electrical Room	
Warner Hall	112	
White Hall	Wax Room (basement)	
<b>West Side Buildings</b>		
Building	Room #	Date
O'Neill Center		
Classroom Building	124 (time clock)	
A. Searle Pinney Hall	Loading Dock	
Ella Grasso Hall	Main Valve Room	