

What Should Schools Do With Expired Hand Sanitizer?

Organizations across Arizona acquired large amounts of hand sanitizer during the COVID-19 pandemic. Much of that hand sanitizer is now expiring. Alcohol-based hand sanitizer typically contains at least 60 percent alcohol by volume. This high alcohol content gives hand sanitizer the ability to catch fire.

The State of Arizona has rules and regulations on how expired or discarded hand sanitizer is managed. This fact sheet will guide you through options to dispose of expired or waste hand sanitizer.

Hand sanitizer's high alcohol content makes it an ignitable hazardous waste when discarded, according to the Resource Conservation and Recovery Act (RCRA). When legitimately reclaimed or recycled, hand sanitizer is not regulated under RCRA as hazardous waste.



What not to do:



- **Do not pour expired hand sanitizer down the drain.** Clean Water Act regulations prohibit the discharge of what would otherwise be an ignitable hazardous waste.



- **Do not put expired hand sanitizer in the garbage.** Regulated hazardous wastes may not go into the regular trash.



- **Do not take expired hand sanitizer to a household hazardous waste collection site.** Household hazardous waste collection sites can take limited amounts of hazardous waste from household generators. **Schools and businesses are not considered household generators and are not allowed to utilize these hazardous waste collection sites.**

What are your options?

Recycling & Reclamation

One of the State of Arizona's goals is to minimize waste generation whenever possible, and a good way to accomplish this goal is through recycling. Alcohol-based hand sanitizer is exempt from hazardous waste regulations when it is returned to the manufacturer or to a recycler who can reclaim the alcohol. In other words, legitimately recycled hand sanitizer is not regulated as hazardous waste.

There are important exceptions to what constitutes recycling: reclaimed alcohol cannot be used as fuel or burned for energy recovery. The U.S. Environmental Protection Agency has created a website that gives guidance on identifying legitimate recycling opportunities: [bit.ly/epa-hs-disposal](https://www.epa.gov/hand-sanitizer-disposal)

Please note that businesses and organizations that recycle their waste hand sanitizer must provide appropriate documentation showing the waste hand sanitizer is legitimately recycled.

Generators of hazardous waste are responsible for their waste from the time it is generated until the time it is treated and disposed of. If a recycling/reclamation facility mismanages waste, the generator is still liable.

What if reclamation and recycling isn't an option?

Disposal as a hazardous waste

If legitimate recycling or reclamation isn't possible, then expired hand sanitizer must be disposed of as hazardous waste. Managing hand sanitizer as hazardous waste means sending the sanitizer to a permitted hazardous waste disposal facility, following all RCRA regulations, submitting annual reporting to the Arizona Department of Environmental Quality (ADEQ) via myDEQ, paying all applicable fees and meeting other requirements.

Need help finding a transporter for your hazardous waste?

ADEQ has a list of transporters that serve Arizona on the ADEQ Website: bit.ly/hazwaste-mgmt

What are Generator Categories and Why are They Important?

Generator categories are determined by how much hazardous waste your school produces each month. The EPA has established three categories of generators:

Very Small Quantity Generators (VSQG)

Less than 220 pounds of hazardous waste generated per month.

Small Quantity Generators (SQG)

Between 220-2,200 pounds of hazardous waste generated per month.

Large Quantity Generators (LQG)

Greater than 2,200 pounds of hazardous waste generated per month.

Each generator category has different requirements for storage, labeling and disposal of hazardous waste (see figure 1). It is important to know your school's generator category to ensure that Federal and state regulations are followed. To learn more about hazardous waste management and generator categories, please visit ADEQ's website: azdeq.gov/HazWaste.



Gallons of hand sanitizer would be equivalent to

220 POUNDS



If a school is a VSQG or SQG and it has enough unusable hand sanitizer to dispose of, that disposing of it would cause them to generate a quantity of waste greater than their current generator category's maximum amount, it could be classified as an episodic event*. For more information on episodic events, please contact ADEQ at HazardousWasteICU@azdeq.gov.

**Per 40 CFR 262.23.1 an episodic event is defined as "an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of hazardous wastes that exceeds the calendar month quantity limits for the generator's usual category."*

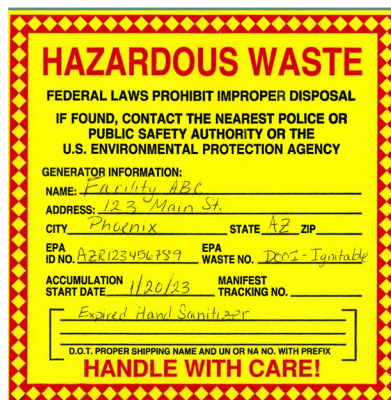


Figure 1:

Example storage container label for both episodic event and hazardous waste disposal.

Still have questions?

For regulatory guidance, please visit ADEQ's website or see EPA's guidance. To request specific regulatory technical assistance, please email us at HazardousWasteICU@azdeq.gov.

For translations or other communications aids, please email the Title VI Coordinator, Leonard Drago, at Drago.Leonard@azdeq.gov or call 602-771-2288.

Para traducciones u otras ayudas de comunicación, envíe un correo electrónico al Coordinador del Título VI, Leonard Drago, a Drago.Leonard@azdeq.gov o llame al 602-771-2288.