

Safe Disposal of E-Cigarettes for Indiana Schools

Guide for school operations staff



Importance of Safe Disposal

E-cigarettes (vapes) have lithium batteries which can pose a fire hazard, especially when damaged by trash compactors. In addition, e-cigarette liquid contains toxic chemicals, including nicotine that can leak from these devices over time and are easily absorbed by skin. Without safe disposal, people and the environment are put at risk.



Do NOT Dispose of E-Cigarettes or E-Liquids:

- In the trash
- In recycling bins
- Down drains, sinks, or toilets
- At Drug Enforcement Administration (DEA) drug take-back days (this option is only for individual consumers not schools)



What You Can Do

Safely Handle and Store E-Cigarettes

- Inspect each e-cigarette for leakage or damage before placing in bin.
- If handling damaged or leaking e-cigarettes, wear gloves to prevent exposure to harmful chemicals and consider wearing other protective gear, such as an apron and eye protection.
- When storing, designate a sealable watertight bin specifically for e-cigarette storage.
- Label the bin with at least “Hazardous Waste Pharmaceuticals” and appropriate hazard symbols (toxic, ignitability, and reactivity).
- The date of first accumulation (the date it first becomes waste) should be clearly labeled on the bin as well.
- Place each e-cigarette collected in individual plastic bags and place them in the designated bin with lid. Do not stockpile vaping devices.
- If any e-cigarettes are leaking or damaged, add a binder to the bin, such as sand or sawdust to absorb spills.
- Ensure bins are stored in a dry, cool place that is locked and inaccessible to students or visitors.





What You Can Do (continued)

Understand Key Definitions

The following terms have been defined below to assist with understanding the next sections.

Healthcare facility:

- Any person that is lawfully authorized to: provide preventative, diagnostic, therapeutic, rehabilitative, maintenance or palliative care, and counseling, service, assessment or procedure with respect to the physical or mental condition, or functional status, of a human or animal or that affects the structure or function of the human or animal body; or
- Distribute, sell, or dispense pharmaceuticals, including over-the-counter pharmaceuticals, dietary supplements, homeopathic drugs, or prescription pharmaceuticals.

Pharmaceutical:

- Any drug or dietary supplement for use by humans or other animals; any electronic nicotine delivery system (e.g., electronic cigarette or vaping pen); or any liquid nicotine (e-liquid) packaged for retail sale for use in electronic nicotine delivery systems (e.g., pre-filled cartridges or vials).

What does this mean?

If your school has a staff member or volunteer (school nurse, district nurse, health aide, volunteer health aide, unlicensed health assistant, school counselor, etc.) that administers over the counter or prescription medicine to students, with or without an in-school nurse's office, then that school is considered a healthcare facility.

For more details on these definitions and additional definitions, refer to this [site](#).

The next page will outline how long to store collected vapes and when to dispose of them.



What You Can Do (continued)

Storage Duration & When to Dispose (Continued):

- **If your school is a healthcare facility (by definition on the previous page):**
 - Bins with collected e-cigarettes can be stored for a full school year. Refer to the bin label that lists the date of first accumulation.
 - Before disposal, you will need to check if your school has an EPA ID and has notified as a healthcare facility under RCRA. You can do this by going to this [webpage](#) and searching for your site. Tips for searching include:
 - Everything must match exactly. Differences like “St.” vs “Street” will exclude sites.
 - When using the site, do NOT enter the site name or school name
 - Enter only the street address and city OR zip code
 - If your school already has an EPA ID, then you can start arranging disposal.
 - If your school does NOT have an EPA ID, you MUST register for one. To do this, use this [webpage](#) to obtain an EPA ID and notify as a healthcare facility. Follow these [instructions](#) to register as a new Industry User in RCRAinfo as a Health Care Facility.
 - As part of the registration process, you will need to determine your school’s hazardous waste generator category. Refer to the appendix on the last page for help.
 - Once you obtain your EPA ID, you can start arranging disposal.
- **If your school is NOT a healthcare facility (by definition on the previous page):**
 - There are three possible hazardous waste generator categories your school may fall under (very small, small, and large quantity generators). These are determined by how much hazardous waste you generate in a calendar month.
 - It is important to note that you will need to consider ALL hazardous waste your school generates (not just vape waste) when determining your hazardous waste generator category. Other examples of hazardous waste might include lithium batteries from electronic devices, laboratory chemicals, expired hand sanitizer, cleaning supplies, pesticides, and vocational shop chemicals.
 - The EPA recommendation is that schools should remove collected vapes on a regular basis to avoid reaching the 2.2 pounds threshold of acute hazardous waste that would move you to a larger quantity generator category.
 - To remain a very small quantity generator (VSQG), e-cigarette waste can be generated in a calendar month until it reaches 2.2 pounds of acute hazardous waste (nicotine e-liquid) and 220 pounds of non-acute hazardous waste (lithium-ion batteries). Once bins with collected e-cigarettes reach VSQG status, it can be stored for 90 days before disposal. Refer to the appendix on the last page to determine how to count hazardous waste from e-cigarettes.
 - The amount of non-acute hazardous waste is the determining factor in your generator status until you reach 2.2 pounds of acutely hazardous waste, then the acute hazardous waste determines generator status.



Determine Your Disposal Options

Disposal Options	Guidance	Criteria
Contractor Utilization (After storing for a full school year)	<ul style="list-style-type: none"> Identify and hire a contractor to pick up the bin of collected e-cigarettes to take to a facility for treatment, storage, and disposal. See next page for potential contractor options. The school must manage their e-cigarettes as hazardous waste pharmaceuticals under 40 CFR Part 266 Subpart P. <ul style="list-style-type: none"> Refer to EPA's FAQs for vape shops. The school must manage their other hazardous waste in accordance with the RCRA hazardous waste generator regulations for SQGs or LQGs. 	School that is a healthcare facility (by definition on page 2)
Contractor Utilization (After storing up to 2.2 pounds of acute hazardous waste)	<ul style="list-style-type: none"> Identify and hire a contractor to pick up the bin of collected e-cigarettes to take to a facility for treatment, storage, and disposal. See next page for potential contractor options. 	School that is not a healthcare facility (by definition on page 2) and is a very small quantity generator (VSQG) of hazardous waste
Small Business Collection Program	<ul style="list-style-type: none"> Contact your county or municipality to find a locally-run small business collection day for hazardous waste. <ul style="list-style-type: none"> Indiana Solid Waste Districts: Click here Indiana HHW Task Force: Click here These programs are often co-located within household hazardous waste collection sites. A fee might be incurred for managing and disposing the hazardous waste. 	School that is not a healthcare facility (by definition on page 2) and is a very small quantity generator (VSQG) of hazardous waste
Off-Site Consolidation with Healthcare Facility	<ul style="list-style-type: none"> Contact the school district to find out if there is a healthcare facility that is owned by or under the control of the school district or that is the supplier of pharmaceuticals, that could temporarily consolidate the hazardous waste and manage and dispose of it. (Refer to CFR); 	School that is a healthcare facility (by definition on page 2) and is a very small quantity generator (VSQG) of hazardous waste
Off-Site Consolidation with Large Quantity Generator	<ul style="list-style-type: none"> Contact the school district to find out if there is a location that is owned by or under the control of the school district and that is an LQG that could temporarily consolidate the hazardous waste and manage and dispose of the hazardous waste in an environmentally protective manner. (Refer to CRF) 	School that is not a healthcare facility (by definition on page 2) and is a very small quantity generator (VSQG) of hazardous waste

If your school is not a healthcare facility and generates more than a VSQG, please see EPA's disposal guidance [here](#).



Potential Hazardous Waste Service Providers

If your local hazardous waste facilities or programs cannot accept vapes, please refer to this list of other hazardous waste service providers for help with disposal of vapes.

- **Veolia** - [Website](#) | Contact: 219-314-6676
- **Republic Services** - [Website](#) | Contact: 317-835-6186
- **Clean Earth** - [Website](#) | Contact: 317-653-0579
- **Lighting Resources** - [Website](#) | Contact: 317-513-4020
- **Arcwood Environmental** - [Website](#) | Contact: 317-675-7157
- **Liquid Waste Removal, Inc.** - [Website](#) | Contact: 317-881-9754

This is not a comprehensive list of hazardous waste service providers. This list is meant to give you a starting point in your search for vape disposal options if your local communities do not have any in place. For more details, you will need to contact these providers to determine what they offer.

Please note that any vape device or cartridge determined to be non-nicotine (e.g. THC, CBD, or other substance) will require school administrators to contact local law enforcement for proper disposal. Hazardous waste disposal providers are unable to accept non-nicotine vapes.

Sources & More Information

Public Health Law Center - Disposing of E-Cigarette Waste [resource](#)

Environmental Protection Agency - How to Safely Dispose of E-Cigarettes: Information for Schools and Small Businesses [webpage](#)

Code of Federal Regulations - Identification and Listing of Hazardous Waste [webpage](#)

Subpart P - Hazardous Waste Pharmaceuticals [webpage](#)

Indiana Department of Environmental Management (IDEM) - Hazardous Waste [webpage](#)

IDEM Compliance & Technical Assistance Program (CTAP) - Provides confidential compliance assistance [webpage](#)

Vape Free Indiana [website](#)

Indiana Department of Health - Tobacco Prevention and Cessation [website](#)

Need additional support and resources to address youth vaping in your school?
Find your local tobacco-free coordinator [here](#)

This resource was created by the Indiana Vape Waste Group, a workgroup comprised of a state-level multidisciplinary team within the Indiana Department of Health (Tobacco Prevention and Cessation, Local Health Services, Environmental Public Health), the Indiana Department of Environmental Management (Office of Land Quality, Office of Program Support), the Indiana Department of Education (School Safety), the Indiana Alcohol and Tobacco Commission, the Office of the Indiana Attorney General, and the Family and Social Services Administration (Department of Mental Health and Addiction).



**Tobacco Prevention
and Cessation**



Appendix

Hazardous Waste Generator Category Information:

Disposal options will vary based on how much hazardous waste your school generates in a calendar month. There are three possible hazardous waste generator categories your school may fall under (very small, small, and large quantity generators).

It is important to note that you will need to consider ALL hazardous waste your school generates (not just vape waste) when determining your hazardous waste generator category. Other examples of hazardous waste might include lithium batteries from electronic devices, laboratory chemicals, expired hand sanitizer, cleaning supplies, pesticides, and vocational shop chemicals.

For **non-acute hazardous waste** generated per calendar month:

- Your school would be a **Very Small Quantity Generator (VSQG)** if you generate
 - Up to 220 pounds
- Your school would be a **Small Quantity Generator (SQG)** if you generate
 - Between 221 pounds and 2200 pounds
- Your school would be a **Large Quantity Generator (LQG)** if you generate
 - More than 2200 pounds

An example of **non-acute** hazardous waste is **lithium-ion batteries**.

Pro tip: To exceed 220 pounds of non-acute hazardous waste, your school would have to generate approximately 2,000 lithium-ion batteries.

This would move you to the Small Quantity Generator category.

For **acute hazardous waste** generated per calendar month:

- Your school would be a **Very Small Quantity Generator (VSQG) or SQG** if you generate
 - Up to 2.2 pounds
- Your school would be a **Large Quantity Generator (LQG)** if you generate
 - More than 2.2 pounds

An example of **acute** hazardous waste is **nicotine e-liquid**.

Pro tip: To exceed 2.2 pounds of acute hazardous waste, your school would have to generate more than:

- 1,000 Juuls or
- 76 Elf Bars or
- 200 full 5-milliliter vials

This would move you to the Large Quantity Generator category.

If you need help determining whether hazardous waste is non-acute or acute, please refer to this [webpage](#). For more information on hazardous waste generator categories, refer to this [webpage](#).