

E-Cigarette Waste Management for Utah Schools



Utah Code [53G-8-203\(3\)\(b\)\(iii\)](#) requires schools to confiscate electronic cigarette products.

These will contain liquid nicotine or nicotine residue and may contain lithium batteries.

Nicotine is a listed acute hazardous waste, P075. Lithium batteries are hazardous and universal waste and pose a fire safety hazard.



Liquid nicotine cannot go down the drain and neither the used or unused cartridges or pods can be thrown in the garbage.



Schools that confiscate and need to dispose of these items are **Very Small Quantity Generators (VSQG)** if they accumulate no more than 1 kg (2.2 lbs) of liquid nicotine or empty containers that held nicotine e-liquids (e.g., cartridges and pods). A VSQG must:

- identify their waste
- ensure delivery of the hazardous waste to an offsite treatment or disposal facility permitted to manage hazardous waste, municipal or industrial waste, or a facility that recycles nicotine waste.

The lithium batteries may either be managed as hazardous waste, like the nicotine waste, or be sent to a universal waste handler or destination facility. Universal waste batteries can only be accumulated for a year, so be sure to keep track of when the batteries began accumulating. If the batteries are damaged or leaking place them into a container with a lid that can be securely closed. Label the container with the words "Universal waste batteries," or "Waste batteries," or "Used batteries."



Best practices for VSQGs

Using appropriate PPE, place the e-liquids, cartridges, and pods in a container that is in good condition and has a lid that can be securely closed. Label the container with the words and “Hazardous Waste Nicotine,” and “Danger -Toxic in contact with skin.”

Keep a spill kit stocked with binders (sand/diatomaceous earth/sawdust) and gloves nearby. Have a Safety Data Sheet for e-liquids available (this can be found on the internet).

Keep a log of the amount of waste as it is generated, and

Make arrangements with a disposal company to take the waste BEFORE you accumulate 1 kg/2.2 lbs.

Maintain records to show that the hazardous waste nicotine (e-liquids, cartridges, and pods) was disposed of at a permitted facility as described above.

Lithium batteries that have an odor, are discolored, deformed, bulging or swollen are damaged and have the potential to catch fire when they absorb moisture. Place damaged lithium batteries in a plastic bag and then place the bag in an inert material like sand.

Store lithium batteries away from heat and direct sunlight. Prevent terminals from touching by storing each battery in a plastic bag or cover the terminals.

If a school accumulates **more than 1 kg (2.2 lbs)** of nicotine waste at any time it is considered a **Large Quantity Generator (LQG)** subject to requirements that include:

- Notifying the state of your hazardous waste activity and obtaining an EPA identification number
- Having and maintaining an internal communication or alarm system, telephone or two-way radio, fire, spill control and decontamination equipment
- Preparing and maintaining a written hazardous waste contingency plan
- Making arrangements with local police, fire, hospitals, and other emergency response organizations and familiarizing them with your facility
- Training all employees involved in hazardous waste management on their hazardous waste management duties and response to emergencies
- Storing nicotine waste in properly constructed and labeled/marked storage containers

- Storing the container so that it does not rupture or leak, and ensuring that it remains closed except for when additional hazardous waste is added to the storage container
- Inspecting hazardous waste containers weekly
- Shipping hazardous waste on a uniform hazardous waste manifest to a RCRA permitted hazardous waste treatment, storage, disposal facility (TSDF) within 90 days of reaching the 1kg (2.2 lbs) limit
- Filing a biennial hazardous waste report by March 1st in even numbered years for the previous year

Questions?

**Call the Utah Division of Waste Management and Radiation Control at (801)536-0200
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HB 58 passed during the 2020 Utah General Session, created Utah Code [53G-8-203\(3\)\(b\)\(iii\)](#), requiring Utah's local education authorities to "require a school administrator or school administrator's designee to dispose of or destroy a confiscated electronic cigarette product" and [53G-8-508\(2\)](#), requiring "An LEA shall dispose of or destroy seized electronic cigarette products in accordance with the LEA's policies adopted under Subsection [53G-8-203\(3\)](#)."