



Dangerous Waste Vape Management Options for Schools

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology

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Cover photo:

- Three vapes on a lawn, Ecology image

Related Information

- Ecology's vape waste webpage for schools: ecology.wa.gov/school-vape-waste
- [Interim Policy on Vape Waste in K–12 Schools](#)¹
- [How Schools Apply for an EPA/State ID and Notify as a Health Care Facility](#)²

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¹ <https://apps.ecology.wa.gov/publications/summarypages/2604023.html>

² <https://apps.ecology.wa.gov/publications/summarypages/2604024.html>

³ www.ecology.wa.gov/contact

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Purpose

To provide schools in Washington State with regulatory management options to properly manage accumulated vape waste under the [Dangerous Waste Regulations](#) (Chapter 173-303 WAC).⁴

Background

Vapes, also called vaporizers or e-cigarettes, are battery-operated devices that heat a liquid and produce an aerosol. They come in many shapes and sizes, and they typically contain nicotine or cannabis. Vapes often have lithium-ion batteries.

Managing vape waste is an urgent issue across the United States, leading officials at the local, state, and federal levels to pursue solutions to this expanding problem.

As vaping has grown in popularity, schools now face the added challenge of safely storing and disposing of vapes confiscated from students or discovered on school property. Because vapes contain heavy metals, toxic substances, and lithium-ion batteries, they pose serious risks to public health and the environment. The Dangerous Waste Regulations requires confiscated or discovered vapes to be accumulated, treated, and disposed of as dangerous waste.



Figure 1. Vapes come in many shapes and sizes. Some are considered disposable or single use.

Are Confiscated or Discovered Vapes a Dangerous Waste?

Yes. Most vapes are dangerous waste, whether empty or not. Appropriate management depends on their contents. Washington State uses four-character waste codes that describe the type of waste and the risks it represents. A dangerous waste might have multiple codes.

- Nicotine is P-listed (P075) acute hazardous waste. Therefore, the residues in the vape cartridge remain acute hazardous waste even if the device is empty.
- Cannabis vape waste is typically a state toxic dangerous waste (WT02).

⁴ apps.leg.wa.gov/WAC/default.aspx?cite=173-303

- Lithium-ion batteries carry the ignitable and reactive hazardous waste codes (D001 and D003, respectively).

Dangerous Waste Generator Categories

The options available for schools to manage dangerous waste vapors depend on their generator category.

A "generator" is defined as "any person, by site, whose act or process produces dangerous waste or whose act first causes a dangerous waste to become subject to regulation."⁵ In the case of schools, when vapors are confiscated or discovered on site, the school is considered the generator.

All generators must count their waste every month to determine their generator category. Washington State regulates three categories with different requirements.

- Small quantity generators (SQGs).
- Medium quantity generators (MQGs).
- Large quantity generators (LQGs).

The higher the generator category, the more regulations apply. Some schools have collected and over-accumulated their vapor waste, making them subject to large quantity generator requirements.

How do I know my monthly generator category?

Determine the amount and type(s) of dangerous waste generated by the school in a calendar month. This includes any other quantities of dangerous waste generated at the school. See Figure 2 and refer to [WAC 173-303-169](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-169),⁶ [WAC 173-303-170\(10\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170),⁷ and [Ecology's generator category webpage](https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/generator-category)⁸ for more information. A school exceeding small quantity generator quantities must manage vapor waste and other pharmaceutical wastes under the requirements for a health care facility ([WAC 173-303-555](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555)).⁹

⁵ [WAC 173-303-040](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-040) (<https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-040>)

⁶ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-169>

⁷ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170>

⁸ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/generator-category>

⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555>

	Small quantity generator (SQG)	Medium quantity generator (MQG)	Large quantity generator (LQG)
 Dangerous waste	220 pounds or less	More than 220 pounds but less than 2,200 pounds	2,200 pounds or more
 Toxic EHW and AHW	2.2 pounds or less	2.2 pounds or less	More than 2.2 pounds
 Spills of toxic EHW and AHW	220 pounds or less	220 pounds or less	More than 220 pounds

Figure 2. Use this chart to determine your generator category based on the amount and type(s) of dangerous waste you generated during a calendar month. EHW = extremely hazardous waste (code WT01); AHW = acute hazardous wastes that are toxic in small amounts (all P-listed and some F-listed waste codes). See [Appendix A](#) for a plain text version.

Types of Vapes

A vape contains a battery and a liquid-filled tank or cartridge that delivers nicotine or cannabis as a vapor.

“**Single-use vapes**” (or **disposable vapes**) are all-in-one devices with embedded batteries, designed to be discarded after the liquid is depleted. They do not have components that can be replaced or refilled.

“**Reuseable vapes**” (or **refillable vapes**) are a vape device that has a rechargeable battery that can be easily separated from the nicotine cartridge. These vapes have components that can be replaced or refilled.

Counting Nicotine Vape Waste

Schools that generate dangerous waste are required to count this waste every month to determine their [generator category](#).¹⁰ Your generator category determines your disposal options. Because most nicotine waste is acute hazardous waste, it has very low accumulation

¹⁰ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/generator-category>

limits. If you exceed [2.2 pounds of acute hazardous waste](#)¹¹ in a month, you become subject to LQG requirements. This is why it's important to count waste each month.

Counting dangerous waste means you know the weight of the waste.

Generators may count the weight of the P-listed nicotine waste (P075) **separately** from the vape battery (D001 and D003). This is true even for all-in-one devices with embedded batteries, also commonly sold as “disposable vapes.”

Only the nicotine liquid and residue in vape cartridges count as P-listed dangerous waste. To determine generator category, generators **don't** need to count the weight of the entire vape towards their 2.2-pound quantity exclusion limit (QEL) described in [WAC 173-303-169](#).¹² The weight of all liquid and residue remaining in the cartridge must be counted. Weight calculations for vape liquids can be based on the weight of water (1 milliliter of water = 1 gram). If you are unable to determine the amount of waste in the vape, always assume it is full. Remember, the weight of the container (cartridge) doesn't need to be counted toward generator category.

How to count single-use (disposable) nicotine vapes

Single-use (disposable) nicotine vapes are often opaque, meaning you cannot see inside. The container is usually hidden within the vape housing. To count how much nicotine (and therefore acute hazardous waste) you have from these vapes, you can either log the exact amount that a specific vape contains at its fullest or count the maximum amount possible.

Counting the exact amount gives you precision but could take time and research, while using the maximum amount is faster and can make your count easier. You are allowed to use both options if desired. Just ensure you log everything accurately.

Helpful math

Most vapes are sold in milliliters (mL):

- 1 mL = 1 gram of nicotine.
- 998 grams of nicotine = 2.2 pounds of acute hazardous waste.

¹¹ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dangerous-waste-basics/generator-category#GenTable>

¹² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-169>

Counting nicotine vape waste

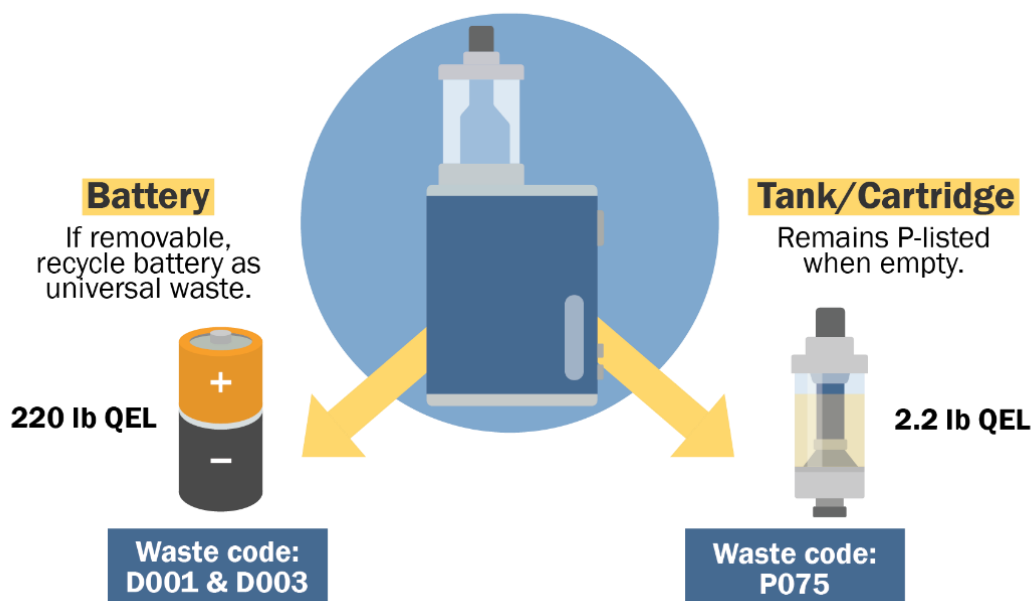


Figure 3: Quantity exclusion limits (QELs) for counting nicotine vape waste.

Option 1: Count the exact amount

Not all disposable vapes come in the same size. Many are sold with 1 mL to 2 mL of nicotine. Other larger devices can contain 6 mL or more. To count the exact amount, look for the amount printed on the product. If it says it's a 1 mL vape, then you have 1 gram of nicotine. Even if the vape seems empty or partially empty, count how much the vape holds at its fullest.

If you can't find the amount on the product itself, look up the specific vape model information. If you still can't find the exact amount, use Option 2 and count the maximum.

Option 2: Count the maximum amount

Generally, the maximum amount a disposable vape can contain is **18 mL (which is 18 grams of nicotine)**. To use this method, you multiply every disposable vape on site by 18.

For example, if you have 55 disposable vapes (55 x 18 grams), you have 990 grams of nicotine.

How to count reuseable (refillable) nicotine vapes

Refillable (or reusable) vapes often have a transparent window, meaning you can see the tank that holds the e-liquid (nicotine-containing liquid). They are also bigger than disposable vapes. To count how much nicotine (and therefore acute hazardous waste) you have from these vapes, you can either log the exact amount that a specific vape contains or count the maximum amount possible.

Counting the exact amount gives you precision but could take time and research, while using the maximum amount is faster and can make your count easier. You are allowed to use both options if desired. Just ensure you log everything accurately.

Helpful math

Most vapes are sold in milliliters (mL):

- 1 mL = 1 gram of nicotine.
- 998 grams of nicotine = 2.2 pounds of acute hazardous waste.

Option 1: Count the exact amount

Not all reusable vapes have the same tank size. Some hold 2 mL while others can hold upwards of 10 mL or more. To count the exact amount, look for the tank size printed on the product. If you can't find the tank size on the product, look up the specific vape model information. If you still can't find the exact amount, use Option 2 and count the maximum.

You are allowed to estimate the amount inside (provided you know how big the tank is), since you can see the liquid. For example, if you have a reusable vape with a 5 mL tank, and it appears the liquid is half used, you can log 2.5 grams of nicotine.

Option 2: Count the maximum amount

Generally, the maximum amount a refillable vape can contain is **24 mL (which is 24 grams of nicotine)**. To use this method, multiply every refillable vape you have on site by 24.

For example, if you have 10 reusable vapes (10 x 24), you have 240 grams of nicotine.

Exceeding 2.2 pounds of acute hazardous waste on site causes the school to become subject to large quantity generator requirements and significantly limits the school's options for future vape waste management. It also triggers requirements for annual fees, regular inspections by Ecology, and regulatory requirements to develop a training program, contingency plan, self-inspection, and recordkeeping. This is why it is very important to count waste each month.

How to log monthly nicotine vape waste

Ecology strongly recommends that you track vape waste amounts generated per month in a spreadsheet, table, or logbook. Table 1 is an example of a log used to track nicotine vape waste quantities. The log should include the date accumulated, type of vape device, and approximate weight of nicotine-containing liquid, using counting criteria discussed above. The log should also include a running total of how much nicotine waste you have on site. If schools accumulate more than 2.2 pounds in total, not just per month, the school becomes subject to large quantity generator requirements.

Logs of nicotine vape waste should be retained for five years. Once the waste is shipped off site, reset the log's running total, but continue to count your monthly total.

Be sure to:

- Keep all logs of nicotine vape waste for five years.
- Ship waste off site before totals exceed 998 grams (2.2 pounds).
- Reset your running total when you ship your waste off site, but continue to count your monthly total.

Table 1. Example log of nicotine vape waste. Calculations in this example use maximum amounts (disposable vapes = 18 grams; reusable vapes = 24 grams).

Date	Vape device type	Quantity	Nicotine weight (grams)	Running total on-site (grams)	Notes/Actions
4/3/2026	disposable	1	18	18	
4/6/2026	disposable	4	72	90	
4/9/2026	reusable	1	24	114	
4/10/2026	disposable	3	54	168	
4/13/2026	reusable	2	48	216	
4/15/2026	disposable	3	54	270	
4/17/2026	disposable	4	72	342	
4/20/2026	reusable	2	48	390	
4/24/2026	disposable	4	72	462	
4/29/2026	disposable	1	18	462	
April 2026 Total	--	--	480 grams	480 grams	
5/1/2026	disposable	3	54	534	
5/7/2026	reusable	2	48	582	
5/11/2026	disposable	2	36	618	
5/13/2026	disposable	4	72	690	
5/15/2026	disposable	5	90	780	
5/19/2026	disposable	3	54	834	
5/20/2026	disposable	4	72	906	
5/21/2026	--	--	--	0	Sent 906 grams for disposal
5/26/2026	disposable	3	54	54	
5/29/2026	reusable	1	24	78	
May 2026 Total	--	--	510 grams	132 grams	
6/2/2026	disposable	2	36	168	
6/5/2026	disposable	3	54	222	
6/12/2026	disposable	4	72	294	
June 2026 Total	--	--	162 grams	294 grams	

Counts in Table 1 are example totals for accumulated nicotine vape waste. Cannabis vape waste must be accumulated and counted separately. To avoid being subject to large quantity generator requirements, nicotine vape waste must be shipped off school property before totals exceed 998 grams or 2.2 pounds.

Cannabis Vape Waste

It is important to segregate cannabis vape waste from nicotine vape waste. Cannabis vape wastes are not accepted at some treatment, storage, and disposal (TSD) facilities in Washington State. Because cannabis is a Schedule I controlled substance, cannabis waste is not allowed to cross state lines, even between two states where it's legal, unless approved from the Drug Enforcement Administration (DEA). TSD facilities have acceptance criteria and if they do not accept this waste, they will likely screen a school's vape waste to make sure that no cannabis vape waste is included.

If a school mixes cannabis and nicotine vape waste, a TSD facility that does not accept cannabis waste will likely reject the shipment, costing staff time and money. When schools confiscate vapes, it will help to inquire what type of device it is from the student, to make waste segregation easier. Cannabis vape liquids are generally thicker, more viscous, and darker in color when compared to nicotine vape liquids, which are generally thinner and lighter in color. For vapes where the contents are not visible, schools can use the labeling on the vape device to research the type of vape device online.

When counting cannabis waste, small quantity generators may generate up to 220 pounds of dangerous waste per calendar month, so exceeding generator thresholds is less of a concern for cannabis vape waste.

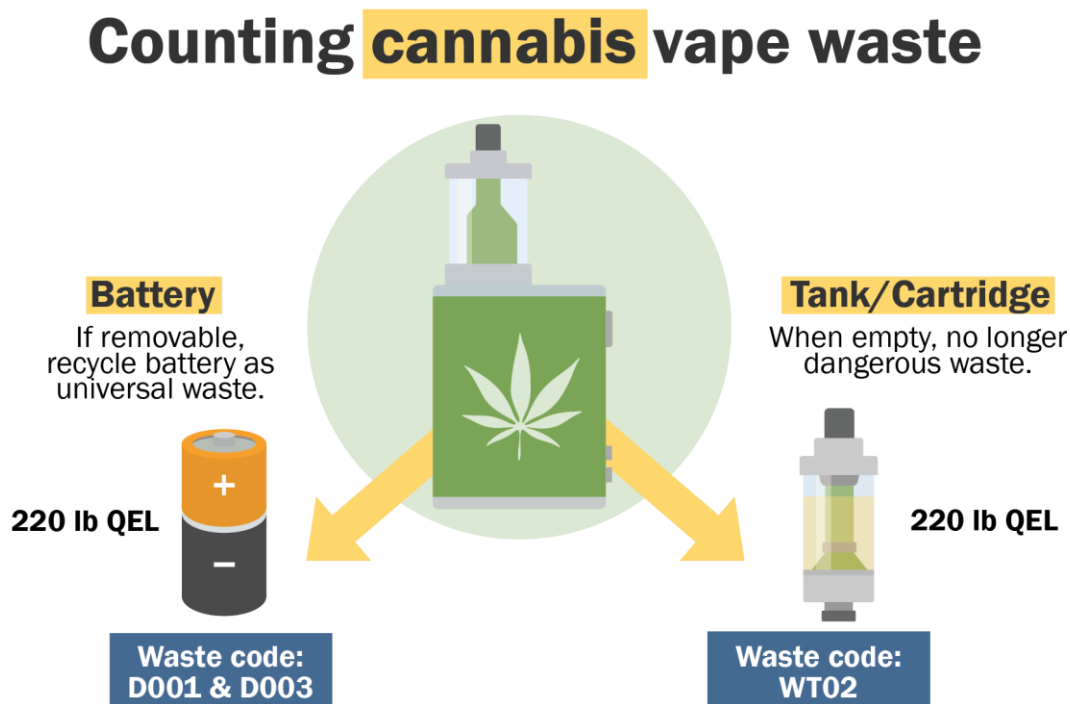


Figure 4. Quantity exclusion limits (QELs) for counting cannabis vape waste.

Options are available for managing cannabis vape waste if the battery is separated or removed from the device. For reuseable vapes, look for a battery compartment that can be opened using common household tools. This is usually located at the base of the device and may involve removing a small screw. In some cases, the cannabis cartridge will unscrew from the device. For single-use (disposable) cannabis vapes, Ecology recommends having a professional waste service provider separate the battery from the device or find other options for disposal.

The battery, separated or removed from the cannabis vape waste, can be managed as universal waste. Small quantity generators can dispose of the cannabis waste portion of the vape (without the battery) in the garbage. Medium or large quantity generators can manage the separated cannabis waste portion of the vape as special waste and dispose of them at a local solid waste landfill that will accept them. See [Focus on: Special Waste Exclusion](#)¹³ for more details on requirements.

The Dangerous Waste Regulations ([WAC 173-303-071\(3\)\(nn\)](#))¹⁴ conditionally exclude state-only dangerous wastes that are controlled substances (including cannabis) that are held in the custody of law enforcement agencies, from the requirements of the Dangerous Waste Regulations. However, conditions for the exclusion need to be met. This exclusion requires that the cannabis be sent to an incinerator. However, some of the acceptance criteria for these incinerators is to not accept vapes with batteries, so batteries will likely need to be removed for these to meet the exclusion criteria. Schools should talk with their school resource officers who may be able to properly dispose of cannabis vape wastes.

Vape Batteries

Vape batteries, if separated or removed from the delivery system, can be managed as [universal waste](#).¹⁵ Universal waste is a common category of dangerous waste that has simpler rules to follow. Even if the vape is a single-use (disposable) vape, there are processes to remove batteries from these consumer products. Ecology recommends hiring a waste service provider to conduct these activities. The casing of each individual battery cell must not be breached in this process and must remain intact and closed. Separated P-listed nicotine cartridges must be handled as dangerous waste. Some waste service providers are experienced in this work and will process vape devices to remove batteries, so schools do not need to conduct this activity. For best management practices handling lithium-ion batteries, see [Focus on: Lithium-Ion Batteries](#).¹⁶

Batteries that cannot be removed from vape devices cannot be managed under the universal waste regulations. The entire delivery system must be disposed of as dangerous waste.

¹³ <https://apps.ecology.wa.gov/publications/SummaryPages/2104013.html>

¹⁴ <https://app.leg.wa.gov/wac/default.aspx?cite=173-303-071>

¹⁵ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/common-dangerous-waste/universal-waste>

¹⁶ <https://apps.ecology.wa.gov/publications/SummaryPages/2404043.html>

Treatment and Disposal

Ecology cannot recommend any specific vendor or TSD facility. However, we can summarize available options for disposal to permitted TSDs in Washington State that accept vape waste.

Public schools have the option to use the hazardous waste vendor contracted under the state contract. For more information, please refer to the [Dangerous Waste Handling and Disposal Services webpage](#)¹⁷ through Washington's Department of Enterprise Services. It is available to public schools, state or local governments, and nonprofits. Charter schools may qualify due to public funding. Private schools are not covered unless publicly funded.

At the time of publishing this document, the TSD facility with the state contract accepts nicotine vapes and provides an on-site vape battery disassembly service to remove embedded batteries from all vape devices. They will manage the separated batteries and nicotine vapes in different containers and transport them off school property. In some cases, they might not be able to remove the battery from the nicotine vape and will need to manage those devices separately from the vapes they are able to separate.

Another TSD facility in Washington accepts nicotine vapes with batteries for a set price per pound with a likely minimum pound amount charged. They will work with the school on requirements to manifest the waste off site. A manifest is a shipping document used to ship dangerous waste.

Option 3 below discusses an alternative disposal pathway to [contact a local Moderate Risk Waste \(MRW\) facility](#).¹⁸ For permitted commercial hazardous waste service providers, look on [Ecology's webpage](#).¹⁹ Note: A school does not necessarily need a nearby permitted commercial waste service provider, because most of these facilities travel across the state to process waste for customers.

What are options for schools to manage dangerous waste vapes?

First, determine if your school should follow the [Interim Policy for Vape Waste in Schools](#)²⁰ to clean out excess vape wastes. Then review the options below and choose one to manage the school's vape waste going forward. Option 1 is a continuation of the same process used in the Interim Policy, with the addition of counting vape waste so the school does not accumulate too much and lose the future option to consolidate.

¹⁷ <https://apps.des.wa.gov/DESContracts/Home/ContractSummary/03924>

¹⁸ <https://ecology.wa.gov/waste-toxics/community-waste-toxics/household-hazardous-waste-mrw/find-a-household-hazardous-waste-site>

¹⁹ <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/dangerous-waste-guidance/dispose-recycle-or-treat/hazardous-waste-service-provider>

²⁰ <https://apps.ecology.wa.gov/publications/SummaryPages/2604025.html>

The options below are not an all-inclusive list but are meant to represent the majority of vape waste management options available to schools. Pay careful attention to the requirements, advantages, and disadvantages, because some options presented may not be the best fit for a particular school or school district. Options one through three are the most likely to be used by most schools.

Option 1

Small quantity generator schools consolidate pharmaceutical vape waste from other schools in the district [WAC 173-303-555(3)(o), (4)(b), and (5)(b)]

One or more schools in the school district [notify](#)²¹ as a Health Care Facility and consolidate vape waste (as pharmaceutical waste) from small quantity generator schools within the same district. Nicotine vape wastes are pharmaceutical wastes and most schools meet the definition of a health care facility under WAC 173-303-555 because they have a nurse's office administering medications. Schools can consolidate their other dangerous waste pharmaceuticals, such as leftover or expired medications, with nicotine vape waste at the consolidating school.

This option essentially lets schools continue the same process they operated under during the interim policy (that is, generating schools take their vape waste to the consolidating school, and the consolidating school coordinates disposal).

However, Option 1 has additional requirements:

- Each generating school must:
 - Count and log their vape waste to ensure they remain a small quantity generator.
 - Move nicotine vape waste off site before accumulating 2.2 pounds of nicotine on site. This is necessary to maintain their status as small quantity generator.

Requirements

- Follow applicable requirements of [WAC 173-303-555](#).²²
- At least one school in the school district must apply for an EPA/State ID number and notify as a Health Care Facility Consolidating School (consolidating school).
 - See the publication [How to Get an EPA/State Identification Number and Notify as a Health Care Facility for Schools](#)²³ or contact WA-RCRAInfo@ecy.wa.gov or 1-800-874-2022 with questions about applying for an EPA/State ID Number.
- Sending and receiving schools must be in the same school district. For private schools, sending and receiving schools must be owned by the same entity.

²¹ <https://ecology.wa.gov/dwnotification>

²² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555>

²³ <https://apps.ecology.wa.gov/publications/SummaryPages/2604024.html>

- School district offices and district shops cannot be the health care facility consolidation point for vape wastes unless they meet the definition of a health care facility in [WAC 173-303-555\(1\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555(1)).²⁴
- Schools generating vape waste must manage all vape waste in a manner that prevents unauthorized access. Vape wastes must be stored in a closed, structurally sound compatible containers, labeled or marked as “Hazardous Waste Pharmaceuticals” or “Dangerous Waste Pharmaceuticals,” with the date the first vape waste was added.
- Schools generating vape waste (non-consolidating schools) must be small quantity generators and maintain their status as a non-notifying health care facility.
- Schools generating vape waste (non-consolidating schools) must track the amount of vape waste they accumulate up to small quantity generator amounts ([WAC 173-303-171\(1\)\(c\)](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-171(1)(c)))²⁵ before transferring the waste to the consolidating school. This is referred to as counting. Consolidating schools do not need to track or count their own generated vape waste toward their generator category.
- The consolidating school keeps records of shipments for five years from the date they received the generating school’s vape waste. These records should include the date the vape waste is received, the generating school’s name, and the amount or weight of vape waste received.
- The consolidating school must complete a simple annual report.

Advantages

- School districts can consolidate vape waste from all schools in the district to a single location.
- Managing vape waste this way is safer.
- Consolidating to one school can reduce disposal costs.
- Schools can accumulate small quantity generator amounts of vape waste and all other dangerous waste pharmaceuticals for up to one year.
- There’s no limit to the number of times generating schools can consolidate their vape waste and all other dangerous waste pharmaceuticals to the consolidating school.
- Schools don’t need to manifest vape waste sent from schools to the consolidation point. A manifest is a shipping document used to ship dangerous waste.
- Any school district personnel can transport vape waste to the consolidating school from small quantity generator schools.

²⁴ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555>

²⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-171>

Disadvantages

- School district shops and offices likely cannot be the vape waste consolidation point for the school district unless they meet the definition of a health care facility.

Option 2

Small quantity generator schools have vape waste picked up directly by a hazardous waste service provider [WAC 173-303-171(1)(e)(i) and (ii)]

Schools can have a waste service provider transport their dangerous waste to a permitted TSD facility.

Requirements

- Schools must comply with small quantity generator requirements in the Dangerous Waste Regulations.

Advantages

- Simplest option for an individual school.

Disadvantages

- Small quantity generator schools cannot directly consolidate waste from other schools for transport to a TSD facility unless using other consolidation options.
- Higher disposal costs are associated with disposing of smaller quantities of waste.
- Schools risk exceeding small quantity generator accumulation limits without frequent dangerous waste pickups (both pharmaceutical and nonpharmaceutical).

Option 3

Small quantity generator schools self-transport vape waste to county moderate risk waste (MRW) facility [WAC 173-303-171(1)(e)(iii)]

If a school is a small quantity generator, it can self-transport dangerous waste to a permitted moderate risk waste (MRW) facility.²⁶ Many MRW facilities do not accept dangerous waste vapes or pharmaceutical waste from business sources. [Contact a local MRW facility](https://ecology.wa.gov/waste-toxics/community-waste-toxics/household-hazardous-waste-mrw/find-a-household-hazardous-waste-site)²⁷ first to confirm whether they will accept the school's waste stream. In many cases, a school may need to travel far to find a MRW facility that will accept business-generated vape waste.

²⁶<https://ecology.wa.gov/waste-toxics/community-waste-toxics/household-hazardous-waste-mrw>

²⁷ <https://ecology.wa.gov/waste-toxics/community-waste-toxics/household-hazardous-waste-mrw/find-a-household-hazardous-waste-site>

Requirements

- Schools must be small quantity generators.
- Schools cannot notify as managing pharmaceutical waste as a health care facility and must maintain this status.
- Schools must track the amount of vape waste and only accumulate up to small quantity generator amounts.

Advantages

- This is a simple solution for schools near MRW facilities accepting vape waste from business sources.
- Small quantity generator schools can self-transport their waste to the MRW facility.
- Schools may be able to avoid mobilization or minimum fees charged by dangerous waste transporters. Some disposal fees may still apply at the time of disposal.

Disadvantages

- Currently, there are only a few MRW facilities in Washington State that accept vape waste from business sources. In many cases, a school would need to transport their vape waste a long distance.
- Some MRW facilities may not accept vape waste from outside their jurisdiction.
- MRW facilities may limit how much vape waste they will accept from a school at a time.
- School districts cannot consolidate waste from multiple schools for transport to an MRW facility.
- Medium and large quantity generators or schools notifying as managing dangerous waste pharmaceuticals under the health care requirements cannot use Option 3.
- Higher potential disposal costs are associated with limited quantities.

Option 4

School district becomes permitted as a moderate risk waste (MRW) facility [WAC 173-350-360]

A school or school district can build or modify a facility and apply with their local health department for an MRW handling permit. Moderate risk waste consists of both household waste and waste from small quantity generators that meet the conditions for exemption in WAC 173-303-171.²⁸ Permitted MRW facilities can manage both household waste and small quantity generator waste, or just one of these waste streams.

²⁸ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-171>

Requirements

- MRW facilities will only accept waste from households and small quantity generators not notifying as health care facilities.
- MRW facilities must meet permitting requirements in the [moderate risk waste handling standards](#).²⁹

Advantages

- School districts can manage waste from small quantity generator schools at a larger scale (county level), providing a long-term solution.
- School districts can choose to only accept waste from other schools within certain areas.
- School districts can accumulate dangerous waste off site from schools, reducing risk to students and staff.
- Multiple schools or school districts can share costs for disposing of small quantity generator wastes.
- MRW facilities do not have accumulation time limits or quantity exclusion limits, allowing them to choose shipping frequencies based on costs rather than time or accumulation limits.
- Many schools qualify to send their waste to MRW facilities, as the majority of schools are non-notifying under WAC 173-303-555 and are small quantity generators of waste.

Disadvantages

- Schools that are medium or large quantity generators can't take advantage of MRW facilities.
- The costs associated with permitting an MRW facility, including associated building modifications to meet permitting requirements may be cost-prohibitive.
- Additional staff training is needed to ensure safe management of wastes and for meeting the requirements for an MRW facility.

Option 5

Schools that are medium or large quantity and also notify as a health care facility [WAC 173-303-170, -172, -200, -201, and -555]

Schools or school districts that generate larger amounts of dangerous waste need to manage it under stricter requirements that have less flexibility. This is why it is important for schools to count their waste and stay within small quantity generator thresholds specified in [WAC 173-](#)

²⁹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-350-360>

[303-169](#).³⁰ This is especially important for nicotine vape waste, because accumulating greater than 2.2 pounds will cause a school to be a large quantity generator. (See [How Do I Count Vape Waste](#) above.)

Because schools generally meet the definition of a health care facility, if a school is a medium or large quantity generator, the school needs to manage their vape waste and pharmaceutical waste as dangerous waste pharmaceuticals. This requires the medium or large quantity generator school to follow all the requirements in [WAC 173-303-555](#)³¹ for their pharmaceuticals and vape wastes.

School district shops and offices generally do not meet the traditional definition of a health care facility. If a school district shop or office is a medium or large quantity generator, they would need to manage any vape waste or pharmaceutical waste under the dangerous waste generator requirements. These sites would not be eligible to use the dangerous waste pharmaceutical rules.

Requirements

- Schools and school district must follow the dangerous waste generator requirements as specified and referenced in [WAC 173-303-170](#)³² applicable to medium or large quantity generators.
- Schools must follow all requirements in [WAC 173-303-555](#).³³ This includes:
 - Notifying as a health care facility. See [How to Apply for an EPA State ID and Notify as a Health Care Facility Publication](#).³⁴
 - Managing nicotine vape waste under these rules.
 - See [Ecology's Managing Pharmaceutical Waste Webpage](#)³⁵ for more details.
- Schools must manifest their waste and send it to a TSD facility following the requirements in WAC 173-303-555(9)³³ and WAC 173-303-180.³⁶ EPA's e-Manifest System website has information on using the e-Manifest system.³⁷ To find a hazardous waste service provider, see the [Treatment and Disposal Section](#).

³⁰ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-169>

³¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555>

³² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170>

³³ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-555>

³⁴ <https://apps.ecology.wa.gov/publications/SummaryPages/2604024.html>

³⁵ <https://ecology.wa.gov/PharmaWaste>

³⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-303-180>

³⁷ <https://www.epa.gov/e-manifest>

Advantages

- The school can be the health care facility consolidating school within its district. It can accept pharmaceutical and vape waste from other small quantity generator schools in the same district.

Disadvantages

- The school or school district needs to follow the stricter generator requirements for medium or large quantity generators.
- The school cannot consolidate their pharmaceuticals or vape waste to other schools and must manifest this waste directly to a TSD facility.

Option 6

Small quantity generator school consolidates vape waste at large quantity generator school district. [WAC 173-303-171(1)(e)(ix) and -200(15)]

If they meet the requirements below, school districts that are large quantity generators may accumulate on-site dangerous waste received from schools within the district that are small quantity generators. This option involves managing the vape waste under more strict requirements as dangerous waste, **not** as pharmaceutical waste as outlined in Option 1 above. The large quantity generator, in this option, **isn't** a notifying health care facility.

Requirements

- The small quantity generator school must be under the control of the same person (as defined in WAC 173-303-040).
 - "Control" means, for the purposes of WAC 173-303-171(1)(e), 173-303-200(15), and 173-303-555, the power to direct the policies of the generator, whether by the ownership of stock or voting rights. Contractors, consultants, and transporters who operate generator facilities on behalf of a different person, as defined in this section, shall not be deemed to "control" such generators.
- Small quantity generator schools need to track amounts of vape waste and only accumulate up to small quantity generator amounts. Under this option, the small quantity generator schools maintain their small quantity generator status by consolidating these wastes to the large quantity generator site before they exceed waste levels which will trigger them to follow the more stringent requirements for large quantity generators.
- The large quantity generator school district must notify Ecology using the Site Identification Form according to the instructions on the form at least 30 days prior to receiving the first shipment from small quantity generator schools. The Site Identification Form must include:

- The name(s) and site address(es) for the small quantity generator schools.
- The name and business telephone number for a contact person for each small quantity generator school.
- The Site Identification Form must be resubmitted within 30 days if there is a change in the name or site address for any of the small quantity generator schools.
- The large quantity generator school district must maintain records of shipments for five years from the date the dangerous waste was received from the small quantity generator.
 - These records must identify the name, site address, and contact information for the small quantity generator and include a description of the dangerous waste received, including the quantity and the date the waste was received.
- The large quantity generator school district complies with the independent requirements identified in [WAC 173-303-170\(2\)\(a\)\(iii\)](#)³⁸ and the conditions for exemption in this section.
- The large quantity generator school district must label the container or unit with the date accumulation started (that is, the date the dangerous waste was received from the small quantity generator). If the large quantity generator school consolidates incoming dangerous waste from a small quantity generator with either its own dangerous waste or with dangerous waste from other small quantity generators, the large quantity generator must label each container or unit with the earliest date any dangerous waste in the container was accumulated on site.

Advantages

- Is a simple solution for the school sites that are already large quantity generators of waste.

Disadvantages

- The consolidation can only occur from schools under the control of a school district that is a large quantity generator. In Washington State, there are only a couple schools districts that are large quantity generators of waste.
- Accumulated waste from small quantity generator schools can only be held for 90-days at the large quantity generator school before being sent off for treatment and disposal.

³⁸ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-170>

Appendix A. Monthly quantity exclusion limits (QELs) by generator category

You are considered a **small quantity generator (SQG)** if you generate:

- 220 pounds or less of dangerous waste,
AND
- 2.2 pounds or less of toxic extremely hazardous waste and/or acute hazardous waste,
AND
- 220 pounds or less of spills of toxic extremely hazardous waste and/or acute hazardous waste.

You are considered a **medium quantity generator (MQG)** if you generate:

- More than 220 pounds but less than 2,200 pounds of dangerous waste,
AND
- 2.2 pounds or less of toxic extremely hazardous waste and/or acute hazardous waste,
AND
- 220 pounds or less of spills of toxic extremely hazardous waste and/or acute hazardous waste.

You are considered a **large quantity generator (LQG)** if you generate:

- 2,200 pounds or more of dangerous waste,
OR
- More than 2.2 pounds of toxic extremely hazardous waste and/or acute hazardous waste,
OR
- More than 220 pounds of spills of toxic extremely hazardous waste and/or acute hazardous waste.

Appendix B. Acronyms and Abbreviations

AHW: Acute hazardous waste

DEA: United State Drug Enforcement Administration

Ecology: Washington State Department of Ecology

EHW: Extremely hazardous waste

EPA: United States Environmental Protection Agency

HWTR: Hazardous Waste and Toxics Reduction Program

ID: Identification

lb: Pound

LQG: Large quantity generator

Manifest: Uniform Hazardous Waste Manifest

mL: milliliters

MQG: Medium quantity generator

MRW: Moderate risk waste facility

QEL: Quantity exclusion limit

RCRA: Resource Conservation and Recovery Act

SQG: Small quantity generator

TSD facility: Treatment, storage, and disposal facility

WAC: Washington Administrative Code

Department of Ecology's Region Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 47600 Olympia, WA 98504	360-407-6000