



Interim Policy for Vape Waste in K–12 Schools



Program Name: Hazardous Waste & Toxics Reduction

Policy Effective: August 26, 2026

Policy Ends: December 31, 2031, or when rescinded by Ecology

Date(s) of Substantive Updates: Not applicable

References: Dangerous Waste Regulations ([Chapter 173-303 WAC](#))¹

Purpose

This interim policy allows a one-time consolidation of nicotine² vape waste (vape waste) from K–12 schools in Washington. It provides K–12 school districts enforcement discretion to send vape waste to a health care facility school, even if the generating school exceeds 2.2 pounds of P-listed vape waste. Consolidation must occur within a district, under the [special requirements for management of dangerous waste pharmaceuticals](#)³ (Pharmaceutical Rules).

Applicability

This interim policy applies to all K–12 schools meeting the definition of a **health care facility** under the Pharmaceutical Rules.

If the school's nurse's office administers medications, then the school qualifies as a health care facility under the Dangerous Waste Regulations.

Schools that generate vape waste (generating schools) can use this interim policy only once to remove stockpiles of vape waste. A consolidating school may use this interim policy multiple times to remove vape waste from

generating schools that have not already participated in the interim policy.



Figure 1: Vape wastes containing nicotine are P-listed dangerous waste.

¹ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-303>

² P-listed acute hazardous waste, waste code P075

³ <https://app.leg.wa.gov/wac/default.aspx?cite=173-303-555>

Policy Requirements

STEP 1: Identify the health care facility consolidating school

The school district:

- Selects one or more schools in the district to be the **consolidating school**. For simplicity under the interim policy, Ecology recommends having only one consolidating school per school district.
- Identifies all **generating schools** within the district which have vape waste.

Consolidating school means the location that meets the definition of a health care facility and receives vape waste from generating schools. School districts may choose more than one consolidating school if they each comply with all policy requirements. School district administrative offices and maintenance shops can act as a consolidating location only if they meet the definition of a health care facility under WAC 173-303-555(1). Most administrative buildings and shops **don't** meet this definition.

Generating school means the school that generated (that is, produced) vape waste by confiscating or discovering abandoned vape waste on their site. Generating schools may transport vape waste one time to the consolidating school under this policy.

STEP 2: Obtain an EPA/State ID number and notify as a health care facility

The **consolidating school** must have an active [EPA/State Identification \(ID\) Number](#)⁴ and notify as a Health Care Facility.

- This notification requirement applies **only** to the **consolidating school**.

For more information:

- Read [How Schools Apply for an EPA/State Identification Number and Notify as a Health Care Facility](#).⁵
- Contact WA-RCRAInfo@ecy.wa.gov or 1-800-874-2022 with questions about applying for an EPA/State ID number.

STEP 3: Notify Ecology

Prior to consolidation of vape waste, the **consolidating school** must notify Ecology.

- The consolidating school notifies Ecology that they're managing P-listed vape waste under this interim policy using our [online form](#) (ecology.wa.gov/school-vape-waste-form). Complete all required fields.

⁴ <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

⁵ <https://apps.ecology.wa.gov/publications/SummaryPages/2604024.html>

STEP 4: Gather, store, and label vape waste properly

Generating school(s):

- Gather all nicotine vape wastes and store them in closed, compatible metal containers, labeled or marked as “Hazardous Waste Pharmaceuticals” or “Dangerous Waste Pharmaceuticals.”
- Add the date the first vape waste was added to the container (accumulation start date).
- The containers must be secured to prevent unauthorized access and be structurally sound and non-leaking.
- Ecology recommends having all generating schools within a school district coordinate this effort around same time.
- A consolidating school must also follow this step for their own vape waste.

Note: As a controlled substance, cannabis vapes may not be managed under this policy and must be accumulated separately from the nicotine vape waste. See [Dangerous Waste Vape Management Options for Schools publication](#)⁶ for management options for cannabis vape devices.

STEP 5: Consolidate, transport, and keep records

Within 60 days of STEP 4, the **generating school** ensures their vape waste is delivered to the consolidating school.

- Vape waste can be self-transported to the consolidating school by any school district personnel.
- 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.

STEP 6: Send vape waste to a permitted treatment, storage, and disposal facility

Within one calendar year of the earliest accumulation start date of vape waste, the **consolidating school** sends all consolidated and self-generated vape waste to a permitted treatment, storage, and disposal facility on a Uniform Hazardous Waste Manifest.⁷ The earliest accumulation start date could be when the consolidating school first accumulated their own vape waste, or a date on vape waste they accepted from a generating school.

⁶ <https://apps.ecology.wa.gov/publications/SummaryPages/2604023.html>

⁷ WAC 173-303-555(9)

Interim Policy for Vape Waste in K–12 Schools

- Find a Washington State **commercial permitted hazardous waste service provider**⁸ on Ecology’s webpage or for schools that use public funding, there is a commercial permitted hazardous waste service provider available under the **state contract**.⁹
- Out-of-state commercial permitted treatment, storage, and disposal facilities are also an option for treatment and disposal.
- When using a Uniform Hazardous Waste Manifest to document shipments of vape waste, you must put the letters “PHRM” on the manifest instead of waste codes.

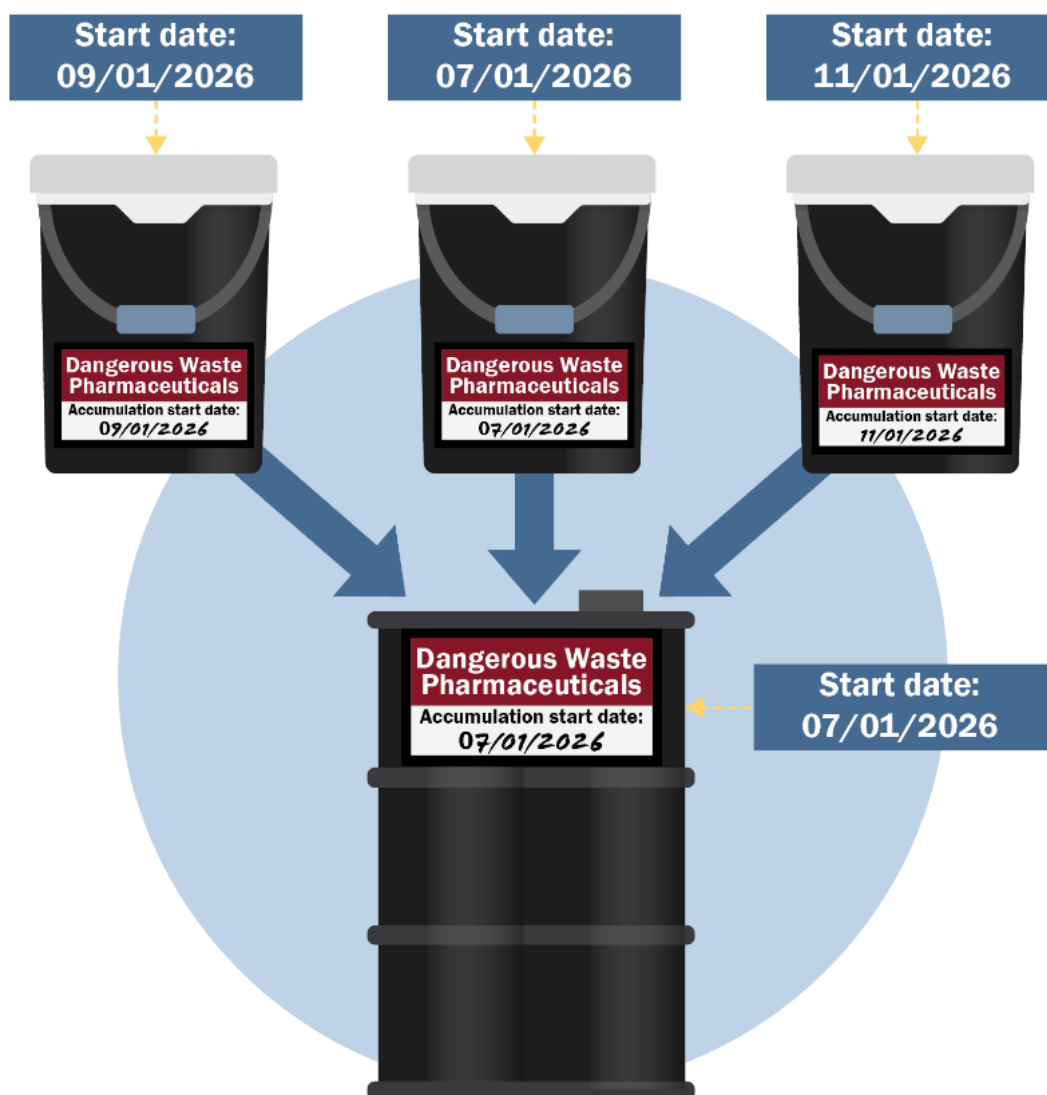


Figure 2: Apply the earliest accumulation start date when consolidating containers.

⁸ ecology.wa.gov/ServiceProviders

⁹ <https://apps.des.wa.gov/DESContracts/Home/ContractSummary/03924>

STEP 7: Submit a dangerous waste report

All **consolidating schools** and sites with an active EPA/State ID number must submit a dangerous waste report by March 1 of the following year.

- Generation and Management Forms aren't required for pharmaceutical waste (that is, vape waste).
- Learn more about dangerous waste reporting:
 - [Dangerous Waste Report webpage](#)¹⁰
 - [RCRAInfo Reporting Guide for Washington State Generators](#)¹¹

STEP 8: Comply with the Dangerous Waste Regulations

After managing waste under the policy, **all schools** must comply with applicable Dangerous Waste Regulations based on their generator category and activities. See [Dangerous Waste Vape Management Options for Schools publication](#)¹² for future vape waste management options.

Generating schools that remain small quantity generators may continue to consolidate vape waste at a consolidating school under the Pharmaceutical Rules.

WAC 173-303-555(3)(o) and (4)(b) detail the rules for consolidating dangerous waste pharmaceuticals from small quantity generators.

Background

The management of vape waste has become urgent 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 vape devices confiscated from students or discovered on school property. Because these confiscated vape devices contain heavy metals, toxic substances, and embedded lithium-ion batteries, vape devices pose serious risks to public health and the environment and need to be managed as dangerous waste.

Some schools have collected vape devices for years because they are aware that the vape waste should not be tossed into the regular garbage. Lacking knowledge on appropriate dangerous waste management for vape devices, some schools have accumulated too much vape waste on site, above the 2.2-pound accumulation limit for P-listed waste. Exceeding this threshold makes schools subject to the Dangerous

¹⁰ [ecology.wa.gov/DWreport](https://apps.ecology.wa.gov/DWreport)

¹¹ <https://apps.ecology.wa.gov/publications/SummaryPages/2504077.html>

¹² <https://apps.ecology.wa.gov/publications/SummaryPages/2604023.html>

Waste Regulations for large quantity waste generators, which include extensive regulatory requirements.

Under this interim policy, Ecology will use our enforcement discretion to allow a school district to consolidate stockpiles of P-listed vape waste at one or more of their notifying health care facility schools under the Pharmaceutical Rules from other health care facility schools that exceed 2.2 pounds.

Pharmaceutical rules apply to vape waste

Electronic nicotine delivery systems (that is, electronic cigarettes or vaping pens) are specified in the definition of "pharmaceutical" in WAC 173-303-555.

Washington's definition is consistent with 40 CFR part 266 subpart P of the RCRA regulations. Environmental Protection Agency's (EPA's) definition of "pharmaceutical" includes *nicotine e-liquids packaged for retail sale and electronic nicotine delivery systems* (that is, e-cigarettes or vaping pens).

What are the benefits of this policy?

1. Streamlined disposal opportunity

This policy allows a one-time consolidation of vape wastes from generating schools to a consolidating school in the same district. This provides school districts flexibility to combine multiple containers of vape waste and schedule fewer waste pick-ups by their vendor.

2. Improved safety and streamlined vape waste management

Removing stockpiles of vape waste from drawers, cabinets, or closets at individual schools creates less exposure and fire risk. One consolidating location simplifies:

- Container labeling
- Emergency preparedness
- Employee training
- Accumulation time limit tracking
- Manifest preparation
- Waste pick-up scheduling

3. Reduced compliance costs

Managing stockpiles of vape waste under this policy can help keep generating schools from exceeding their generator category. A higher generator category requires additional actions and compliance costs. The policy also allows for schools to consolidate vape waste, which may reduce the cost of disposal.

Resources

- [School vape waste webpage](https://ecology.wa.gov/school-vape-waste) (ecology.wa.gov/school-vape-waste)
- [Dangerous Waste Vape Management Options for Schools](#)¹³
- [How Schools Apply for an EPA State ID and Notify as a Health Care Facility](#)¹⁴

Contact Us

Questions? Email us at: vapewaste@ecy.wa.gov

ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to our information and services by meeting or exceeding the requirements of state and federal laws.

To request an ADA accommodation, email HWTRPubs@ecy.wa.gov, call (360) 407-6700, or dial 711 to call us through the Washington Telecommunication Relay for services such as TTY. Visit ecology.wa.gov/ADA for more information.

Language Services

The Department of Ecology is committed to providing language services, including translation and interpretation, for people whose primary language is not English. To request these services, email HWTRpubs@ecy.wa.gov or call 360-407-6700. If you call, ask for an interpreter to be connected with one.

Español. El Departamento de Ecología está comprometido a ofrecer servicios de idioma, incluidos traducción e interpretación, para personas cuyo idioma principal no es el inglés. Para solicitar estos servicios, envíe un correo electrónico a HWTRpubs@ecy.wa.gov o llame al 360-407-6700. Si llama, pida que le conecten con un intérprete.

¹³ <https://apps.ecology.wa.gov/publications/SummaryPages/2604023.html>

¹⁴ <https://apps.ecology.wa.gov/publications/SummaryPages/2604024.html>