

Proper Management of E-Cigarette Waste for Oregon Schools



WHAT?

Nicotine is an acute, P-listed hazardous waste. Lithium-ion batteries are universal hazardous waste that pose a fire and safety hazard.

Under Oregon law, both nicotine and lithium-ion batteries must be properly disposed of as hazardous waste.



Liquid nicotine **cannot** go down the drain.



Cartridges or pods, used or unused, **cannot** be thrown in the garbage.

SO WHAT?

Improper handling and disposal of e-cigarettes pose risks to human health and the environment.

Department of Environmental Quality has rules that govern the proper management and disposal of hazardous wastes. These can be found on the [Oregon Secretary of State Website under Chapter 340, Division 100–103 and Division 113](#). These regulations include, but are not limited to, proper management and disposal of e-cigarette waste and registration as a hazardous waste generator with DEQ — depending on how much waste the generator produces in a calendar month. Refer to the “Hazardous Waste Generator Status” table on the next page.

NOW WHAT?

Determine your hazardous waste generator status.

Based on the amount of hazardous waste generated in a calendar month, a school will be classified under state and federal law within one of the categories listed on the next page.

HAZARDOUS WASTE GENERATOR STATUS

Generator Category	Generation and Accumulation Limits	Storage/Shipping Schedule
Very Small Quantity Generator (VSQG)	<p>In one calendar month you generate any of the following:</p> <ul style="list-style-type: none"> • 220 pounds or less of hazardous waste • 220 pounds or less of spill cleanup debris containing hazardous waste • 2.2 pounds or less of acute hazardous waste <p style="text-align: center;">— OR —</p> <p>At any time you accumulate any of the following:</p> <ul style="list-style-type: none"> • 2,200 pounds or less of hazardous waste on-site • 2.2 pounds or less of acute hazardous waste on-site 	<p>2,200 pounds or less of hazardous waste, or 2.2 pounds or less of acute hazardous waste, may be stored indefinitely on-site.</p>
Small Quantity Generator (SQG)	<p>In one calendar month you generate any of the following:</p> <ul style="list-style-type: none"> • More than 220 pounds but less than 2,200 pounds of hazardous waste • More than 220 pounds but less than 2,200 pounds of spill cleanup debris containing hazardous waste <p style="text-align: center;">— OR —</p> <p>At any time you accumulate any of the following:</p> <ul style="list-style-type: none"> • 13,228 pounds or less of hazardous waste on-site • 2.2 pounds of acute hazardous waste on-site 	<p>Waste must be shipped off-site within 180 days after the waste was first placed in a container. If the receiving facility is more than 200 miles from the generation site, the SQG may store waste up to 270 days.</p>
Large Quantity Generator (LQG)	<p>In one calendar month you generate any of the following:</p> <ul style="list-style-type: none"> • 2,200 pounds or more of hazardous waste • 2,200 pounds or more of spill cleanup debris containing hazardous waste • More than 220 pounds of spill cleanup debris containing an acute hazardous waste • More than 2.2 pounds of acute hazardous waste <p style="text-align: center;">— OR —</p> <p>At any time you accumulate any of the following:</p> <ul style="list-style-type: none"> • More than 13,228 pounds of hazardous waste on-site • More than 2.2 pounds of acute hazardous waste on-site 	<p>All accumulated hazardous waste must be shipped off-site within 90 days of the accumulation start date. If the 90-day deadline is not met, the generator is required to obtain a hazardous waste storage facility permit.</p>

HOW TO HANDLE E-CIGARETTE WASTE

- ❑ 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 via an internet search).
- ❑ Using gloves, place any e-liquids, cartridges, or pods in a container that is in good condition and has a lid that can be securely closed. Label the container with the words “Hazardous Waste Nicotine,” and “DANGER — Toxic in contact with skin.”
- ❑ Keep a log of the amount of waste as it is collected, and make arrangements with a transporter and disposal company to pick up the waste **BEFORE** you accumulate the maximum limit for your generator status.
- ❑ Store lithium-ion batteries away from heat and direct sunlight. Prevent terminals from touching by storing each battery in a plastic bag or by covering the terminals with tape.
- ❑ Place damaged lithium-ion batteries in a plastic bag and then place the bag in an inert material like sand. Lithium-ion batteries that have an odor, are discolored, deformed, bulging, or swollen are damaged and have the potential to catch fire when they absorb moisture.

Follow these steps for safely disposing of e-cigarette waste:

1. If your school is a VSQG, call your closest transfer station to see if they accept these products.
2. If your school is an SQG or LQG, contact a licensed disposal service or follow step three to learn more.
3. Request technical assistance from DEQ to learn about disposal options, planned episodic events, or other disposal details: [oregon.gov/deq/Hazards-and-Cleanup/hw/Pages/Technical-Assistance.aspx](https://www.oregon.gov/deq/Hazards-and-Cleanup/hw/Pages/Technical-Assistance.aspx)
4. Document the process your school will use to manage this type of waste, and share this process with all school staff.

Have questions? DEQ has made it easy to get your questions answered. To learn more and request free, nonregulatory technical assistance, please visit: [oregon.gov/deq/Hazards-and-Cleanup/hw/Pages/Technical-Assistance.aspx](https://www.oregon.gov/deq/Hazards-and-Cleanup/hw/Pages/Technical-Assistance.aspx)

DISPOSING OF LARGE, UNANTICIPATED QUANTITIES OF HAZARDOUS WASTE (“EPISODIC EVENTS”)

In the event that a school (VSQC or SQG) has an unusually large amount of e-cigarette waste to dispose of, this may be defined as a “planned episodic event.” In accordance with episodic event requirements, the school can maintain its status as a VSQG or a SQG.

DEQ’s goal is to help all school waste generators come into compliance with safe disposal regulations.

For more information about episodic events, check out this helpful fact sheet: [oregon.gov/deq/Hazards-and-Cleanup/Documents/EpisodicFS.pdf](https://www.oregon.gov/deq/Hazards-and-Cleanup/Documents/EpisodicFS.pdf).

LEARN MORE

Interested in learning more?

Check out the facts and resources below:

- Approximately 600 million trees are chopped down every year by the tobacco industry.
- Commercial tobacco farming and the tobacco industry are sizable contributors to deforestation in many countries around the world.
- The production of e-cigarettes creates toxic emissions, contributing to air pollution.
- Pods and wands cannot be recycled. They often don't make it into the trash can, littering school grounds and leaking toxins into the ground and air. If they do make it into the trash, they end up in a landfill.
- The batteries in discarded e-cigarettes can cause fires. They can also leak and contaminate groundwater, leading to contaminated drinking water.
- Fact sheet on tobacco's environmental impact: smokefreeoregon.com/wp-content/uploads/2011/06/Tobaccos-Impact-on-the-Environment.pdf
- Educational materials to support your tobacco-free efforts: cyanonline.org/order-materials

DEQ provides online training on hazardous waste rules and managing the most common wastes. Classes are free! Register here: oregon.gov/deq/Hazards-and-Cleanup/hw/Pages/HW-Trainings.aspx

When we refer to “tobacco” we are referring to commercial tobacco products. These are different from the traditional tobacco or other plant mixtures that Native peoples use for ceremonial and spiritual purposes.

This informational document is not policy nor is it intended as a substitute for rulemaking. As guidance, the guidelines provided in this document do not create any substantive or procedural rights.

This document can be provided upon request in alternate formats for individuals with disabilities or in a language other than English for people with limited English skills. To request this publication in another format or language, email Tobacco.inspections@odhsoha.oregon.gov, or call 971-673-2283 (voice) or 711 for TTY.