DEPARTMENT OF ECOLOGY
State of Washington

Washington Chemical Policy Forum Meeting
Interim Policy for Vape Waste in K-12 Schools

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Presentation Agenda

- Problems with Vape Wastes
- Regulatory Framework
- Benefits and Overview of Ecology's Interim Policy
- Future Vape Waste Management Options
- Available Resources
- Questions and Answers

Problems with Vape Waste

- Harmful Ingredients
- Fire Risk
- Difficult to Disassemble
- Costly Disposal
- Confiscated Vapes are DW
- Low Counting Threshold

Dangerous Waste Regulatory Framework

Counting nicotine vape waste

Battery

If removable, recycle battery as universal waste.

220 lb QEL

Waste code: D001 & D003

Tank/Cartridge

Remains P-listed when empty.

2.2 lb QEL

Waste code: P075

Dangerous Waste Regulatory Framework

Counting cannabis vape waste

Battery

If removable, recycle battery as universal waste.

220 lb QEL

Waste code: D001 & D003

Tank/Cartridge

When empty, no longer dangerous waste.

220 lb QEL

Waste code: WT02

Policy Purpose

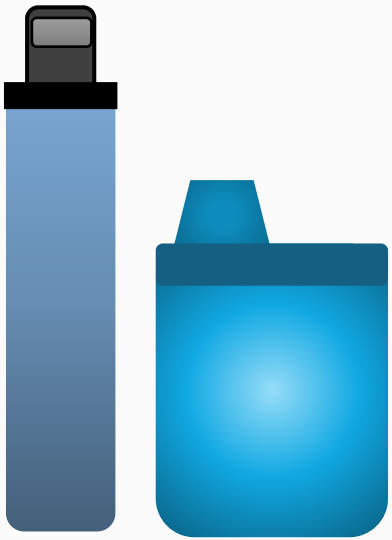
Allows a **one-time** consolidation of **nicotine** vape waste stockpiles from K-12 schools in Washington State under the special requirements for management of dangerous waste pharmaceuticals (pharmaceutical rules), WAC 173-303-555.

Provides Enforcement Discretion

Consolidation of Large Quantity Generator Amounts

Consolidate Vapes within a District

Why pharmaceutical rules?



Nicotine (P075) vape device

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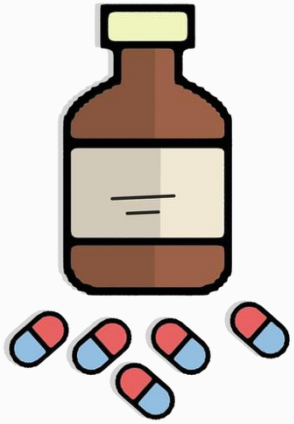
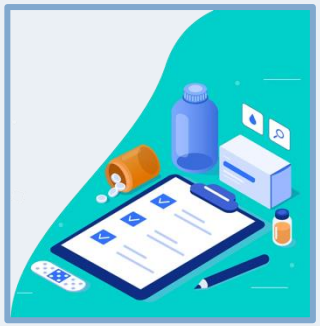
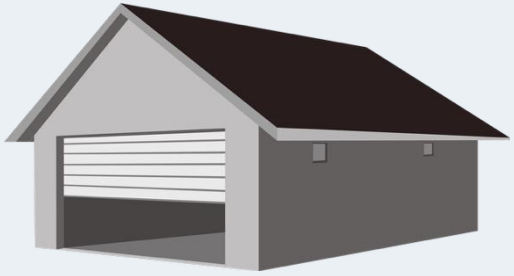


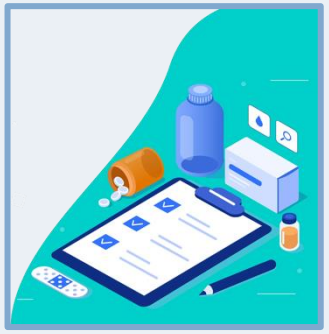
Dangerous waste pharmaceutical

Health care facility, WAC 173-303-555



A school with a nurse's office that administers medications qualifies as a health care facility.

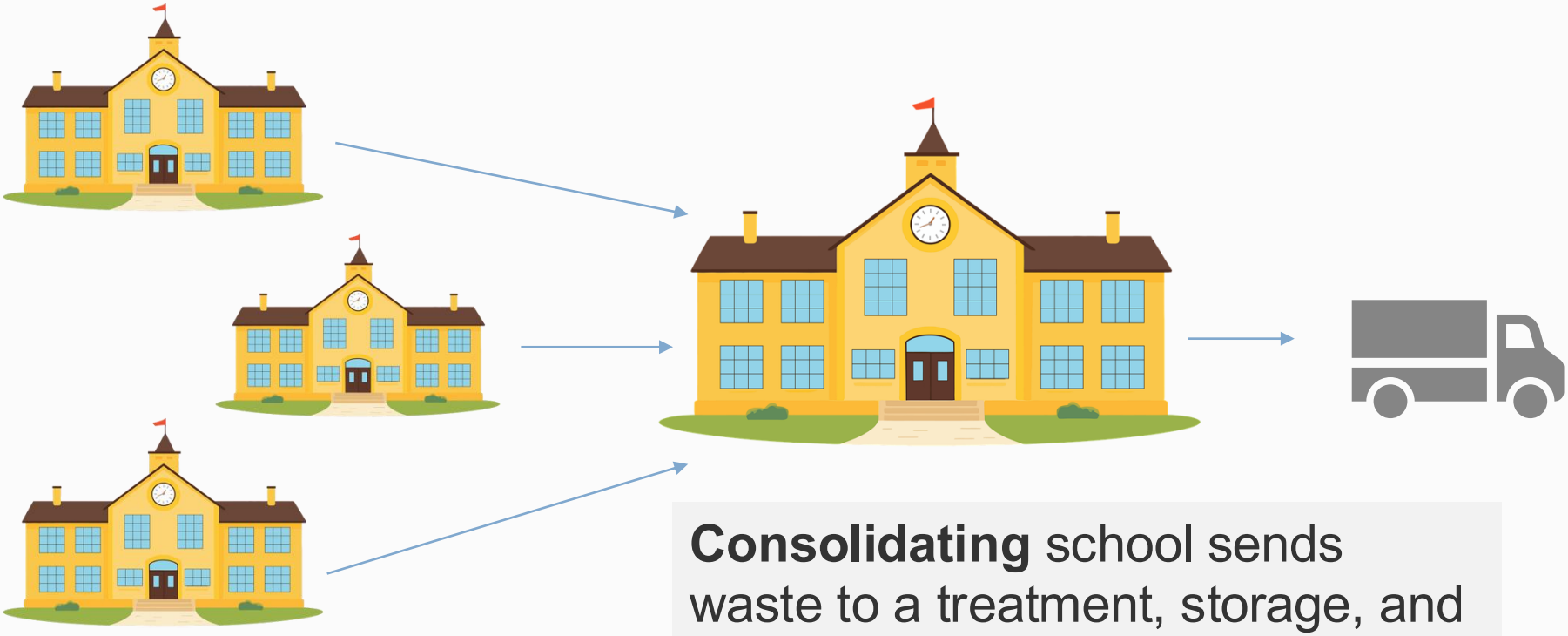




School maintenance facilities or district offices without a nurse's office administering medications don't qualify as a health care facility.

Generating vs. Consolidating School

Generating school(s) ensure delivery of **nicotine** vape waste to a **consolidating** school.



Consolidating school sends waste to a treatment, storage, and disposal facility.

Benefits of the Interim Policy

- Streamline Disposal
- Increase Safety
- Reduce Compliance Costs

Interim Policy Steps Overview

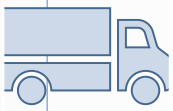
Select consolidating school

Obtain EPA/State ID

Notify Ecology

Gather vape waste

Consolidation, Transportation, and Record Keeping Between Schools



Final Disposal

Dangerous waste report

Select future management option

Interim Policy Step 1

Select consolidating school

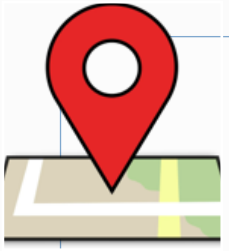
School district:

- Selects consolidating school(s).
- Identifies generating schools with accumulated nicotine vape waste.

Consolidating school:

- Determines where to safely accumulate waste onsite.
- Receives nicotine vape waste from generating schools **within the same district.**

Interim Policy Step 2



Obtain EPA/State ID

Consolidating school

- Registers for RCRAInfo account
- Obtains an EPA/State ID Number
- Notifies as a Health Care Facility

The policy will reference a new step-by-step instruction guide.

Interim Policy Step 3

Notify Ecology

Consolidating school

- Notifies Ecology through an online form.
- This will send an email to our Health Care Team.

Interim Policy Step 4

Gather vape waste

Accumulation requirements:	Labeling:
• Closed and labeled containers • Compatible with contents • Place each individual e-cigarette in a separate clear, sealed plastic bags to prevent the batteries from short-circuiting and catching fire.	• "Hazardous Waste Pharmaceuticals" or "Dangerous Waste Pharmaceuticals" • The date the first vape waste was placed in container.

Print free labels

Interim Policy Step 5

Consolidation, Transportation, and Recordkeeping Between Schools

Generating school:

- Within 60 days of accumulation, nicotine vape waste must be sent to a consolidating school.

Consolidating school:

- Maintains records of shipments for 5 years.
- Shipment date, generating school name, amount of vape waste

Interim Policy Step 6

Vape Waste Disposal

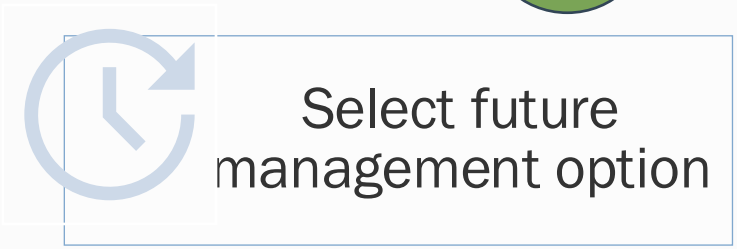
- Consolidating school has one year to dispose.
- Vape waste sent to a commercial permitted TSD facility.
- Shipments must be on a manifest.
- Policy links to waste service providers
- Supplemental guidance expands on disassembly services.

Interim Policy Step 7

Dangerous waste report

Generating school:	Consolidating school:
• No reporting needed unless they have an active EPA/State ID.	• Submits a dangerous waste report by March 1 every year. • If they stop consolidating and aren't MQG or LQG, they can inactivate EPA/State ID.

Interim Policy Step 8



- After using the interim policy:
  - Schools comply with applicable Dangerous Waste Regulation requirements
  - Compliance is based on each schools' generator category and waste generating activities.
- Supplemental Publication:
  - A publication referenced in the interim policy outlines different vape waste (nicotine and cannabis) management options available to schools.
  - Includes continuing with an option very similar to the process outlined in the proposed interim policy.

Future Vape Waste Management Options After Utilizing the Interim Policy

Option 1

- **Schools continue managing their vape waste as pharmaceutical waste.**

- This is basically continuing with the steps in the interim policy.
- The primary difference between this option and the policy is that schools will need to count all wastes and ship their vape waste off-site before reaching large quantity generator thresholds.
- We hope that most schools and school districts choose to continue to manage their vape waste under this option, as it provides the most flexibility and benefits.

Other Future Vape Waste Management Options for K-12 Schools

Option 2	• SQG school has a direct pick-up by waste service provider.
Option 3	• SQG schools self transports to Moderate Risk Waste (MRW) facility.
Option 4	• School district becomes permitted as a Moderate Risk Waste Facility.
Option 5	• Medium or Large Quantity Generators Schools.
Option 6	• SQG school consolidates vape waste at a LQG school district.

Resources

Publications

- Interim Policy for Vape Waste in K-12 Schools
- How Schools Apply for an EPA/State ID and Notify as a Health Care Facility
- Dangerous Waste Vape Management Options for Schools

Websites

- School Vape Waste
- Nicotine, Cannabis, and Vape Waste
- Policy Notification Form

Policy Team Distribution List

- vapewaste@ecy.wa.gov

Any Questions?