STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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June 10, 2026

Subject: Dangerous waste generated by thrift stores in Washington State

Dear Environmental Health and Safety contact:

Washington state's Dangerous Waste Regulations[1] establish a safe and responsible system for managing dangerous waste. The state Hazardous Waste Management Act[2] authorizes the Department of Ecology to ensure compliance with state regulations in lieu of the federal Resource Conservation and Recovery Act.

Ecology recently reevaluated[3] whether waste generated by thrift stores meets the **household waste** exclusion in WAC 173-303-071(3)(c) or are subject to a **dangerous waste** determination. We concluded the household waste exclusion doesn't apply to thrift store waste for the following reasons:

1. Wastes covered by the household hazardous waste exclusion must satisfy two criteria established by the U.S. Environmental Protection Agency (49 FR 44978; November 13, 1984; see RCRAOnline 13358).[4]
    - Household waste must be generated "by individuals in their homes."
    - "The waste stream must be composed primarily of materials found in the wastes generated by consumers in their homes." Materials determined to be waste by thrift stores are not generated by individuals in their homes (a temporary or permanent residence).
2. Washington's Solid Waste Handling Standards exempt reuse collection[5] because materials are donated with the intent to sell, use, or redistribute. Donated materials aren't waste at the time of donation.
3. After thrift stores accept donations, they evaluate materials and decide whether to use, redistribute, sell, or discard them. The thrift store's decision to discard a material is the point of generation[6] for that waste. The Dangerous Waste Regulations apply at the point of generation. If a thrift store finds abandoned materials at their site, the point of generation would be the point at which the material is discovered and determined to be waste.

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[1] Chapter 173-303 WAC: http://apps.leg.wa.gov/wac/default.aspx?cite=173-303
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.300
[3] This reevaluation was necessary following adoption of EPA's Generator Improvements Rule (2019) and revised Solid Waste Handling Standards (2018).
[4] https://rcrapublic.epa.gov/files/13358.pdf
[5] WAC 173-350-020(2)(s)
[6] "**Point of generation**" means the point, including both the date and place, a material is first identified as a solid waste under Chapter 173-303 WAC.

This reevaluation doesn't apply to acceptance of electronic wastes managed under e-Cycle Washington. Collectors[7] for the e-Cycle Washington program may continue to accept electronic waste from the public for recycling without a solid waste handling permit or impacting their generator category. Any business electronic wastes may be managed under Ecology's Interim Enforcement Policy For Conditional Exclusion for Electronic Wastes.[8]

How to properly identify and dispose of your store's dangerous waste

Prior to disposal, thrift stores must fully evaluate all wastes through a process called designation.[9] Thrift stores must determine their generator category[10] based on total waste generated per calendar month. Small quantity generators have greater flexibility for waste disposal options and fewer regulatory requirements than medium and large quantity generators.

Medium and large quantity generators must obtain an EPA/State Identification number and send dangerous waste to a treatment, storage, and disposal facility using a manifest. They're also subject to specific accumulation time limits for on-site storage (180 days and 90 days, respectively). See Ecology's Guide to Dangerous Waste by Generator Category[11] for a comparison table.

Thrift stores can reduce the amount of waste they manage by thoroughly screening donations before acceptance and rejecting unsellable materials. Any materials that cannot be used or sold should be rejected at the time of donation. If the donor decides to dispose of rejected donations, they can find a disposal site[12] on Ecology's website.

Common hazardous materials

Hazardous materials are substances that can harm human health and the environment when mishandled, improperly accumulated, or spilled. When disposed of, most hazardous materials are dangerous waste. Thrift stores may come across the materials listed in Table 1 when sorting

[7] https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/electronics-ecycle-guidance-and-reports/collectors
[8] https://apps.ecology.wa.gov/publications/summarypages/0204017.html
[9] https://ecology.wa.gov/Designation
[10] https://ecology.wa.gov/GeneratorCategory
[11] https://apps.ecology.wa.gov/publications/SummaryPages/2004018.html
[12] https://ecology.wa.gov/FindSiteHHW

donations. Use this information, along with product labels and safety data sheets, to determine how to handle them.

Table 1: Examples of common hazardous materials found in donations. This is not an all-inclusive list.

Hazardous material	Regulatory Information
Bulbs, batteries, and mercury-containing equipment	Handle these common types of dangerous waste under the Universal Waste Rule (WAC 173-303-573). See Ecology's Guide to Universal Waste.[13]
Water and oil-based paints	May be managed under Ecology's Paint Product Stewardship Policy.[14] Small quantity generators may self-transport paint to a PaintCare Program collection site or use a contracted hauler.
Lighters and flammable gases	Likely ignitable (waste code D001) dangerous waste.
Nail polish remover (unused acetone)	Likely listed (waste code U002) and ignitable (waste code D001) dangerous waste.
Cleaning chemicals and disinfectants	May designate for toxicity, corrosivity, or both.
Hand sanitizer	Likely ignitable (waste code D001) dangerous waste unless sent for recycling under the industrial ethyl alcohol exclusion.
Beauty products and cosmetics	May designate for toxicity, ignitability, or both.
Fire extinguishers	May designate for toxicity, persistence, or both.
Pharmaceuticals, over the counter drugs, and supplements	May designate as listed waste or for toxicity. Compressed gases such as inhalers are likely reactive (waste code D003) dangerous waste.

Thrift stores should avoid:

- Pouring dangerous waste down the drain or onto the ground.
- Throwing liquid dangerous waste in the dumpster.
- Combining incompatible waste or wastes with unknown properties.
- Treating dangerous waste onsite, unless treatment by generator[15] requirements are met.
- Placing lithium-ion batteries in the trash (where they can be crushed and ignite).
- Disposing of dangerous waste in the trash without local government approval.

[13] https://apps.ecology.wa.gov/publications/SummaryPages/2104017.html
[14] https://apps.ecology.wa.gov/publications/SummaryPages/2007014.html
[15] https://ecology.wa.gov/DW-treatment-by-generator

If you have questions about your generator responsibilities, we can help. Contact[16] our hazardous waste specialists in your region or request a technical assistance visit.

Sincerely,



Katrina Lassiter, Manager
Hazardous Waste and Toxics Reduction Program

Access an electronic version of this letter at ecology.wa.gov/donation-center-letter or in Ecology's Institutional Memory Database.[17]

ADA Accessibility

To request an ADA accommodation, contact us by phone at 360-407-6700, by email at hwtrpubs@ecy.wa.gov, or visit ecology.wa.gov/ADA. For relay services, dial 711 or call us through your preferred provider.

Language services

We offer translation and interpretation services at no cost. To request them, email hwtrpubs@ecy.wa.gov or call 360-407-6700. If you call, ask for an interpreter to be connected with one.

[16] https://ecology.wa.gov/about-us/contact-us
[17] https://apps.ecology.wa.gov/im/Pages/Search.aspx