Managing Vape Wastes in Washington K-12 Schools

Hazardous Waste & Toxics Reduction Program

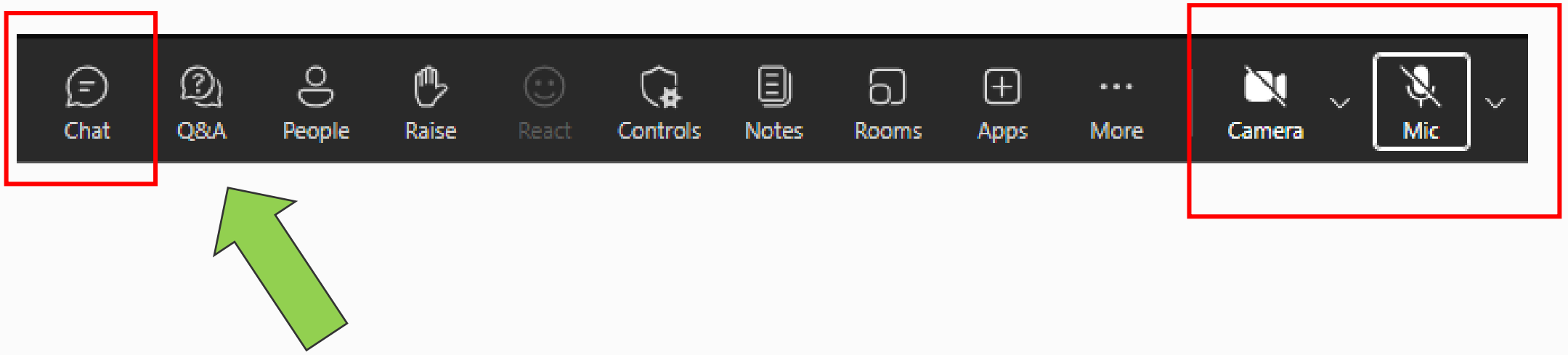
October 15, 2026

Using Teams Webinar

The camera, chat, and microphones are off for this webinar.

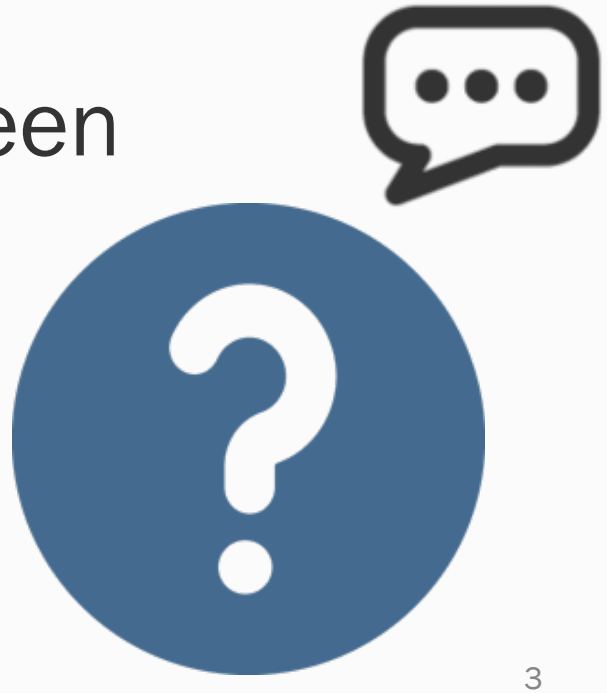
Please type your questions into the Q&A.

We will address questions at the end of the presentation.



Using Teams Webinar

- This webinar is being recorded, and it will be available on Ecology's School Vape Waste webpage.
- The Q&A will not be recorded.
- You can click links as they appear on screen



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The Problem With Vape Waste in Schools

- National management issue
- Vapes are difficult to recycle and dispose of
  - Risk for fires due to mismanagement of batteries in trash
- Not legal for student possession
- Schools have overaccumulated vape waste
- Many vapes are dangerous waste

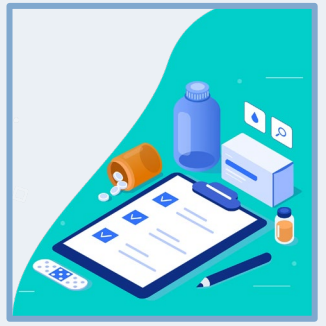
Scope of the Interim Vape Waste Policy

- Kindergarten – 12th grade Private and Public Schools in Washington State.
  - Not applicable to colleges or universities.
  - Schools physically on tribal lands must contact Ecology.
  - One-time opportunity for an individual school to remove stockpiles of waste vape devices.

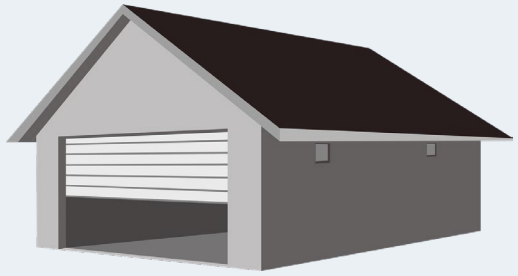
Schools are not Households

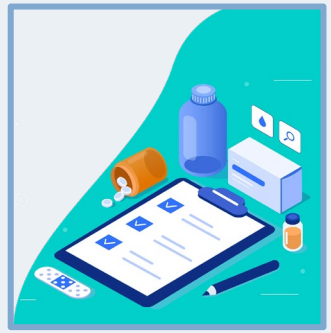
- Vape waste from schools are NOT Household Hazardous Waste (HHW)
  - The definition requires that the waste must be generated by individuals in their homes.
- Vapes cannot be thrown away in the trash.
- Vapes are considered pharmaceutical waste.
- Schools are considered health care facilities.

What is a Health Care Facility?



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



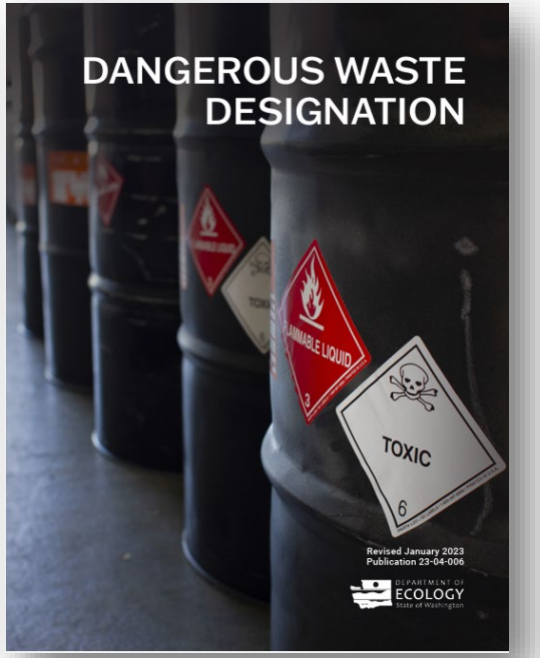


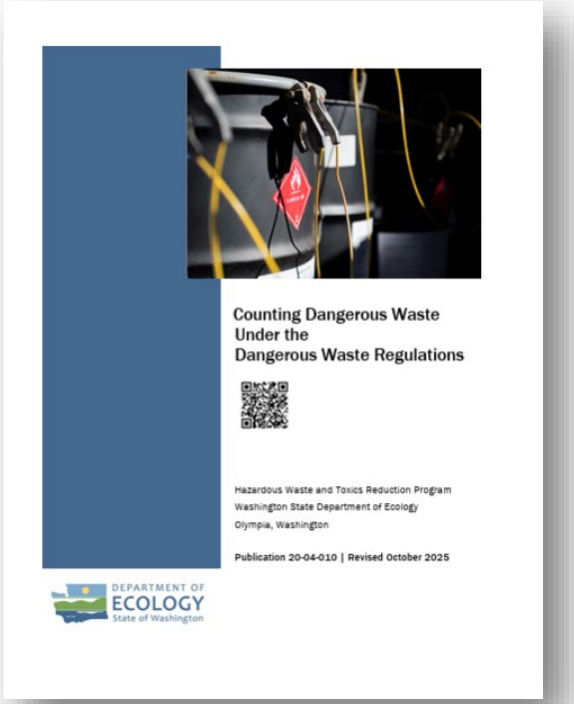
School maintenance facilities or district offices without a nurse’s office administering medications don’t qualify as a health care facility.

Dangerous Waste Basics

A summary of basics principals of dangerous waste and dangerous waste pharmaceuticals

Basics – Designation





It is your responsibility to designate all your waste.
Learn more about designation at ecology.wa.gov/Designation.
WAC 173-303-070

Basics – Wastes That You Might See

Common Waste Found in Schools	Potential Waste Code
Isopropyl Alcohol, Acetone, Propane	D001 – Ignitable
Sulfuric Acid	D002 – Corrosive
Lithium Batteries	D003 – Reactive
Lead Paint Chips	D008 – Toxic

Work with your hazardous waste vendor to properly designate your waste.

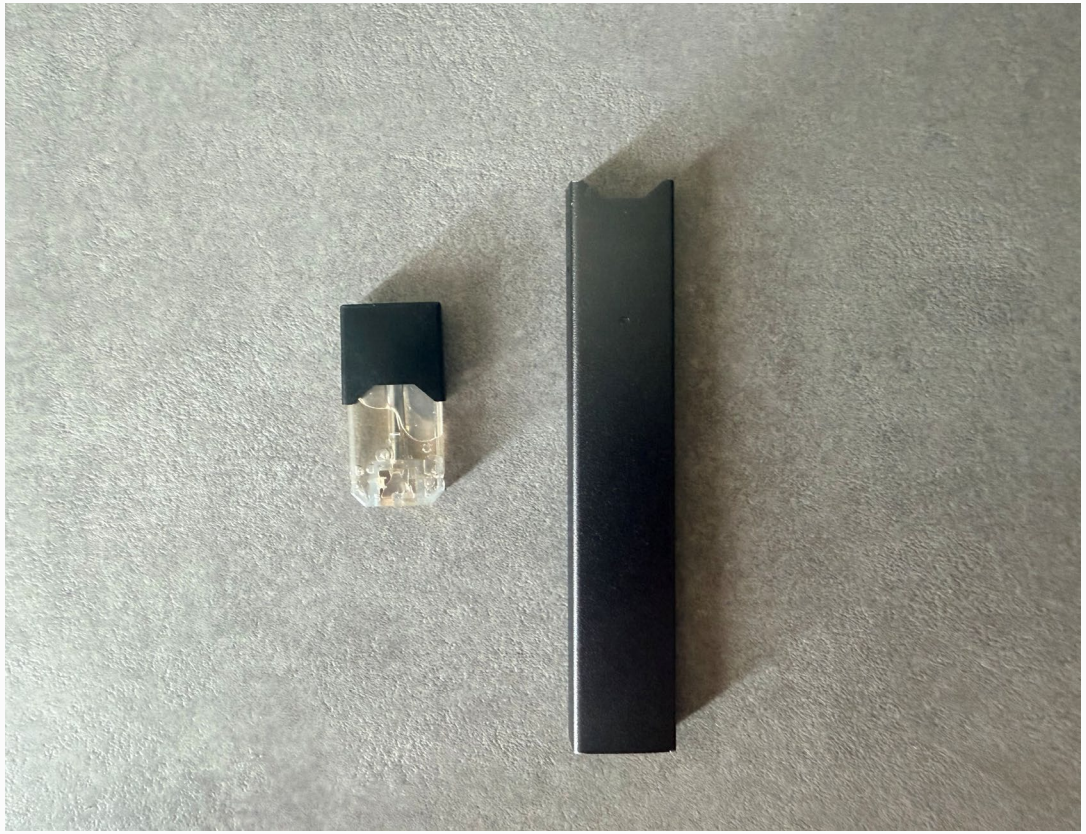
Basics – Waste Codes You Need to Know

Pharmaceuticals and Vape Waste	Potential Waste Code
Nicotine	P075 – Acutely Hazardous
Epinephrine	P042 – Acutely Hazardous
Acetaminophen	WT02 – State-only Toxic
Ibuprofen	WT02 – State-only Toxic
Common Antibiotics	WT02 – State-only Toxic
Cannabis Vape Liquid	WT02 – State-only Toxic
Lithium Batteries	D001 – Ignitable D003 – Reactive

Basics – Universal Waste Batteries

Batteries removed from devices can be shipped as universal waste.

They **are not** counted as dangerous waste when sent for recycling.



A vape battery separated from the cartridge

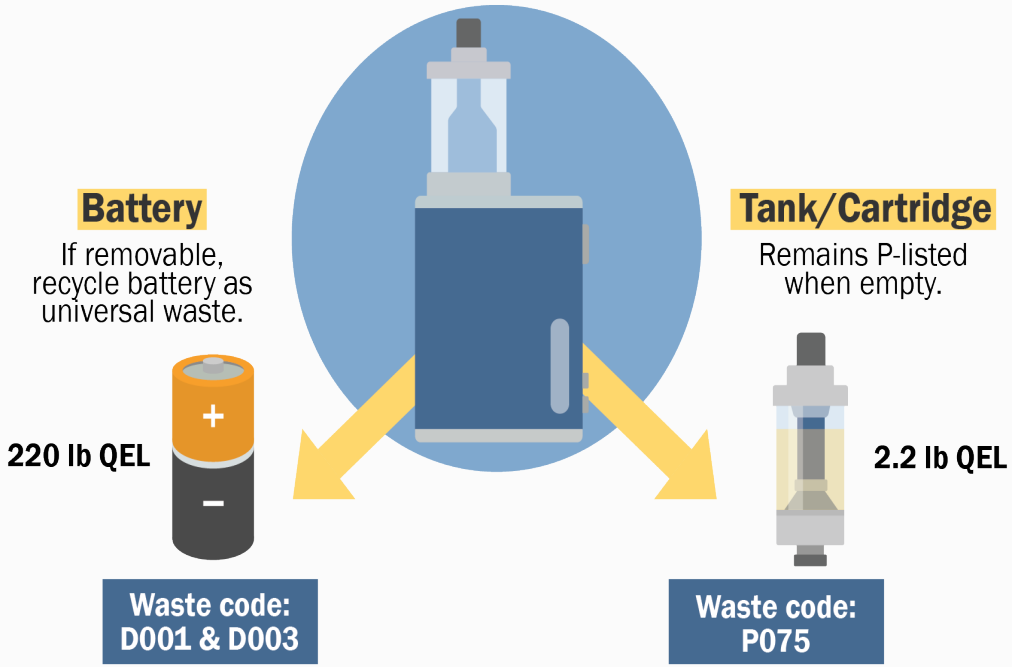
Cannabis Vape Waste

Note: As a controlled substance, cannabis vapes may not be managed under this policy and must be accumulated separately from the nicotine vape waste.

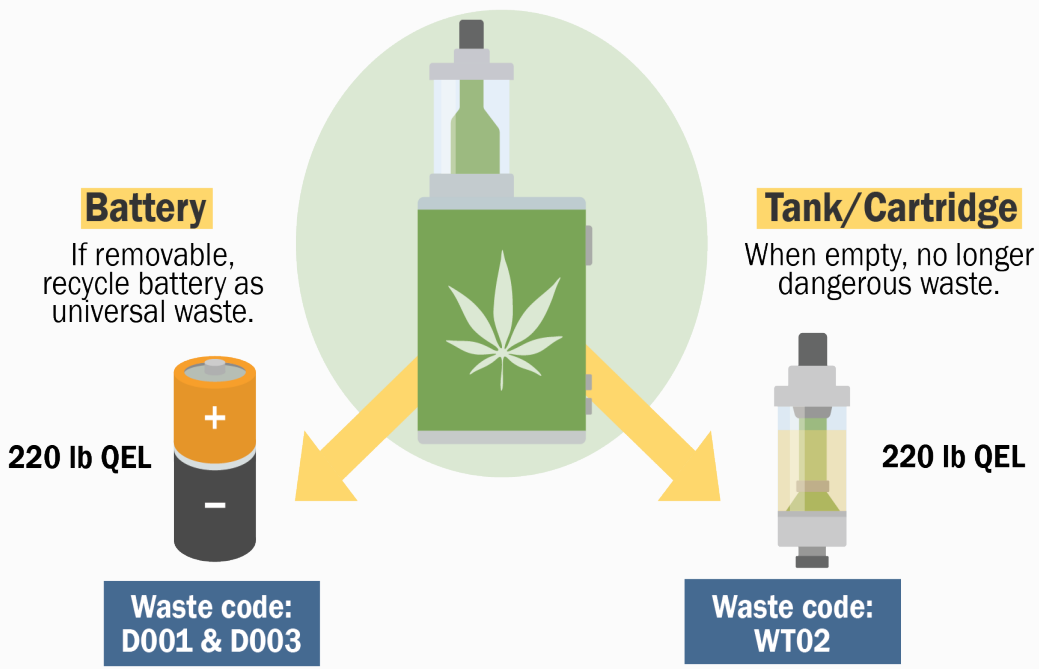
- Cannabis vapes meet the definition of a pharmaceutical waste but cannot be easily transported out of state due to federal controlled substance regulations.
- See the Dangerous Waste Vape Management Options for Schools publication for more guidance on cannabis vape devices.

Basics – Counting Vape Waste

Counting nicotine vape waste



Counting cannabis vape waste



*QEL is Quantity Exclusion Limit

For more information, see Ecology's webpage on Managing vape waste in K-12 schools.

Basics – All Hazardous Wastes

Pharmaceutical Rules (WAC 173-303-555) apply if–

In a calendar month, the school generates:

> 2.2 pounds of dangerous waste with a QEL of 2.2 pounds

or

> 220 pounds of dangerous waste with a QEL of 220 pounds

or

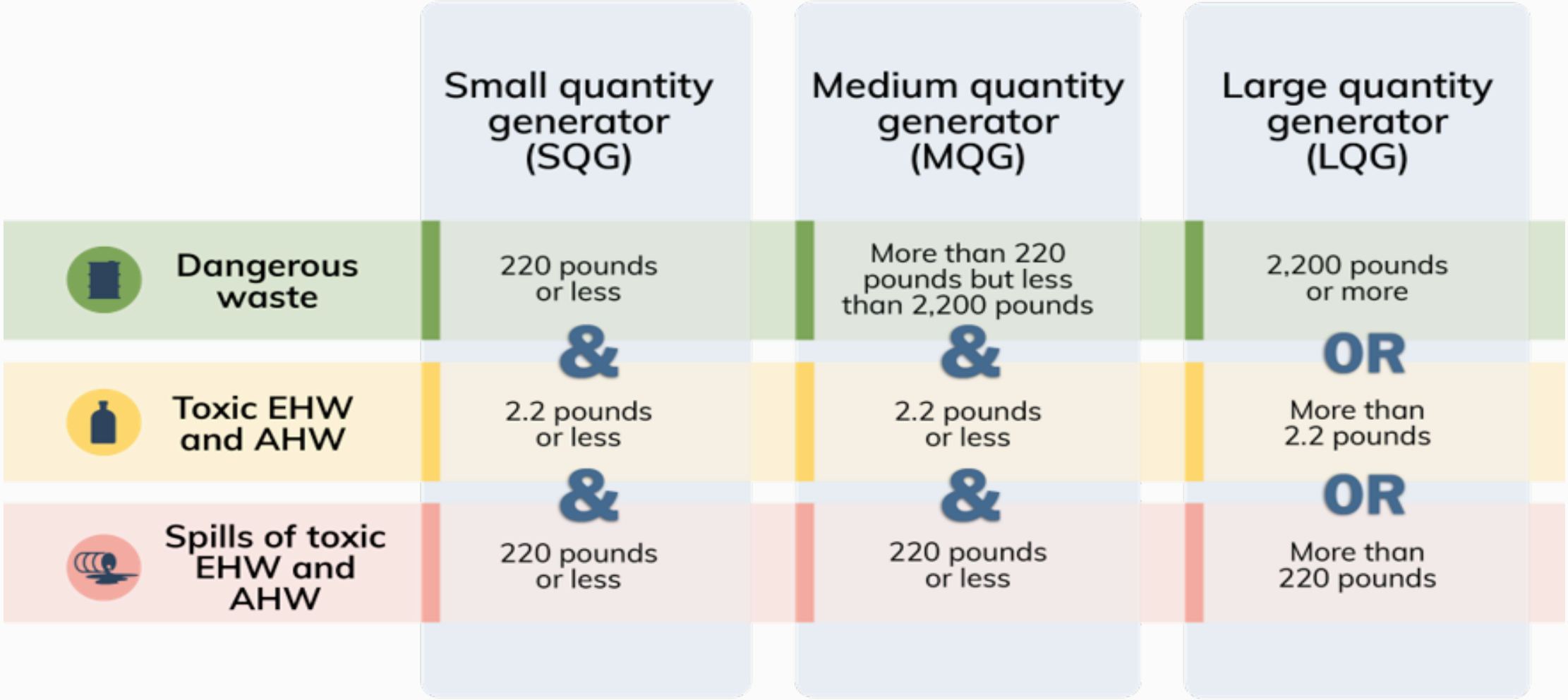
Opt into -555 as a Small Quantity Generator

Schools must count <u>all</u> their dangerous waste.

1) Dangerous waste pharmaceuticals
2) Nonpharmaceutical dangerous wastes

* QEL is Quantity Exclusion Limit – see WAC 173-303-169 for more information

Basics – Generator Category



Basics – Overaccumulation of vape waste

Facility becomes a fully regulated "Large Quantity Generator" with total storage exceeding:

- 2,200 lbs of dangerous waste
  - This is important because lithium batteries are heavy.

-OR-

- 2.2 lbs of acute hazardous waste (P-listed)
  - This is a key point to remember for nicotine vapes since it is an acute hazardous waste.

Basics – SQG vs LQG Requirements

Small Quantity Generator (SQG)

- No accumulation time limit
- No EPA ID required
- No specific container standards
- No label requirements

Large Quantity Generator (LQG)

- 90 waste accumulation limit
- Extensive container/labeling standards
- Satellite Accumulation Area limits
- Weekly Central Accumulation Area Inspections
- General facility inspections
- Annual Reporting

For more information, see Ecology's publications on Guide to Dangerous Waste By Generator.

The Interim Policy for Vape Waste in K-12 Schools

Details of managing vape wastes under the Interim Vape Policy for K-12 Schools.

Benefits of the School Vape Policy

- Offers a one-time relief **to individual schools** from over-accumulation of vape wastes per school over a 5-year period.
- Streamlined disposal opportunity.
- Establishes a sustainable pathway for continued disposal.
- Improves safety for vape wastes.
- Reduced compliance costs.

Vape waste management with the Interim Policy

Overaccumulated school vape waste

Transport from generating to consolidating school

Consolidating school temporarily stores the waste

Ship on a manifest with a vendor

Permitted Hazardous Waste Treatment, Storage, Disposal Facility

Vape Policy: Steps Identify and Obtain ID

- **STEP 1**: Identify the health care facility consolidating school

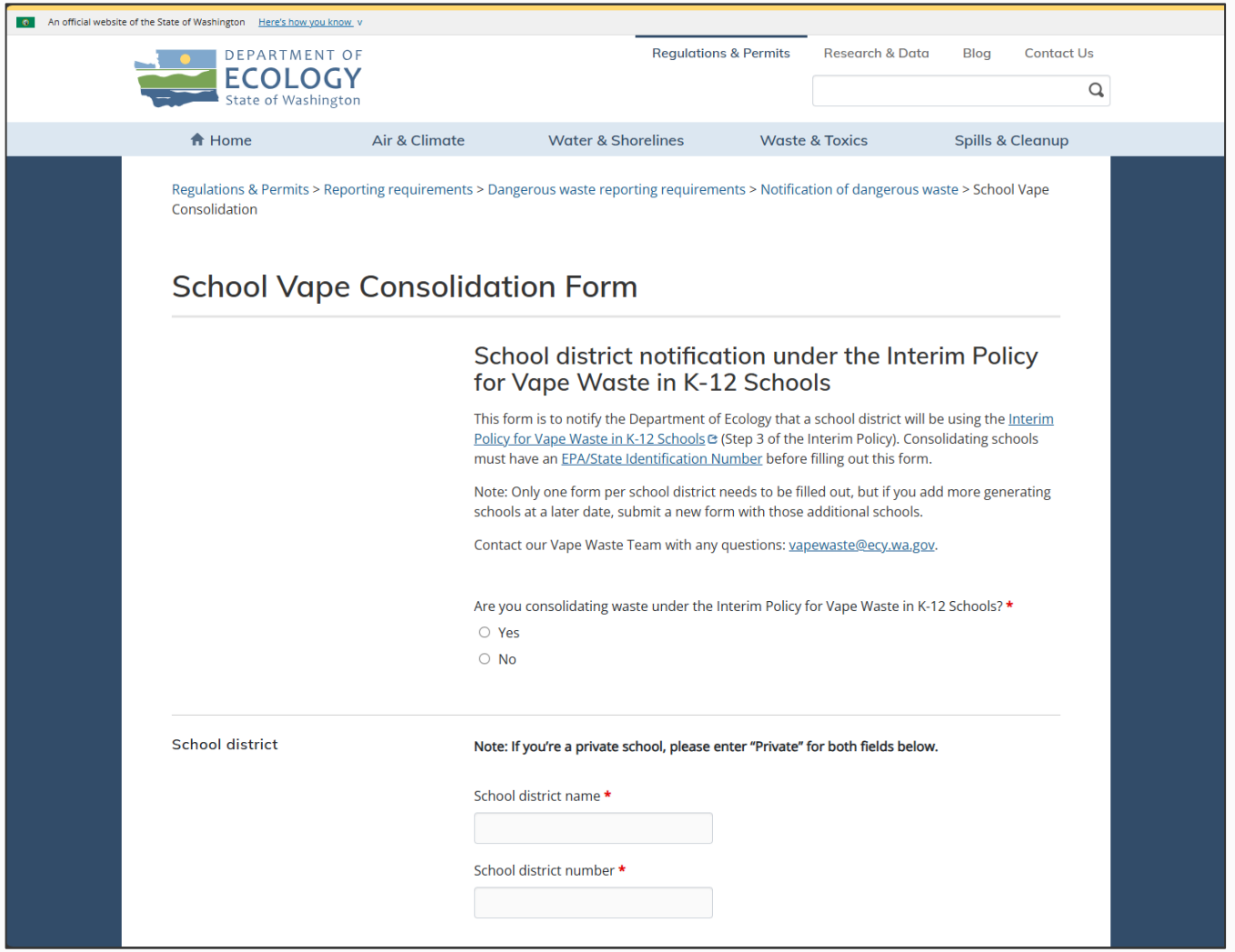
School district:	Consolidating school:
• Selects consolidating school(s). • Identifies generating schools with accumulated nicotine vape waste.	• Determines where to safely accumulate waste onsite. • Receives nicotine vape waste from generating schools **within the same district**.

Vape Policy: Steps Identify and Obtain ID

- **STEP 2**: Obtain an EPA/State ID number and notify as a health care facility via RCRAInfo.
  - RCRAInfo is the portal for obtaining an EPA/State ID number which is used to report generated dangerous waste

Vape Policy: Complete Form

- **STEP 3:** Fill out Ecology's School Vape Consolidation Form online.
- Complete all required fields.



Vape Policy: Gather, Store, Label

- **Step 4**: Manage Vape Wastes Safely and Properly. Containers must be:
  - Secured
  - Closed
  - Labeled
  - Dated

Vape Policy: Consolidate

- **Step 5:** Consolidate, Transport, and Keep Records
  - 60 days from accumulation start date, transfer waste from the generating schools to consolidating school.

School generates vape waste

School district vehicle transports the vape waste

Consolidating school receives vape waste

Vape Policy: Ship for Disposal

- **Step 6:** Send vape waste to permitted Hazardous Waste Disposal Facility on manifest using a transporter.
  - Within one year of earliest accumulation start date (set at generating schools).
  - Shipped with Uniform Hazardous Waste Manifest.

Permitted hazardous waste hauler

Permitted Hazardous Waste Treatment, Storage, Disposal Facility

Uniform Hazardous Waste Manifest

"PHRM" waste code must be used.

GENERATOR

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	1. UN1654, Waste Nicotine 6.1, PG II, "Toxic"	1	DF	30	P	PHRM	D001	D003
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information

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	1. UN1654, Waste Nicotine 6.1, PG II, "Toxic"	1	DF	10	P	PHRM		
	2. UN3480, Lithium-Ion Battery, Class 9, PG II,	1	DF	20	P	D001	D003	
	3.							
	4.							

14. Special Handling Instructions and Additional Information

Vape Policy: Waste Vendors

Hire a waste vendor to help with:

- Separating batteries from vape devices.
- Waste designation.
- Providing appropriate containers and labels.
- Manifest preparation.
- Shipping/disposal of waste.
- Waste service providers

Confirm your shipment has arrived at the final facility within 60-days.

Vape Policy: Annual Reporting is required

- **Step 7**: Submit a Dangerous Waste Report
  - Required for all consolidating schools/sites with an active EPA/state ID Number.
  - Dangerous Waste Reporting

Vape Policy: Determine your generator category

- **Step 8**: Comply with the Dangerous Waste Regulations
  - Count waste monthly per school to determine generator category of that school
  - Must be a true SQG and not a notified health care facility for future consolidation of vapes wastes.

Post-Policy Vape Waste Management

Best practices for on-going safe management of waste vape devices.

Vape Waste Management Using the Interim Policy

Overaccumulated Vape Waste

Self transportation from generating to consolidating school

Consolidating School

Ship on a manifest with a vendor

Permitted Hazardous Waste Treatment, Storage, Disposal Facility

Post-Policy Management of Waste Vapes and Pharmaceuticals

- The vape policy is the health care facility requirements for dangerous waste pharmaceuticals with one-time relief from past over-accumulation.

- Most Vape Policy waste management steps apply, EXCEPT for the allowance of exceeding SQG threshold amounts.

Post-Policy Management – Vape waste consolidation

- Small quantity generating schools may continue to send vape waste for consolidation.

- Generating schools must remain a small quantity generator.

- Consolidating school remains a notifying health care facility and follows the Pharmaceutical Regulations (Policy steps 4 – 8).

Vape waste management **after** the Interim Policy

Overaccumulated vape waste at a school

Consolidation no longer an option

Vape waste management **after** the Interim Policy

Overaccumulated vape waste at a school

Hazardous Waste Transporter

Transportation, storage, and disposal facility

Vape waste management **after** the Interim Policy

SQG amount of vape waste

Self transportation from generating to consolidating school

Consolidating School

Ship on a manifest with a vendor

Permitted Hazardous Waste Treatment, Storage, Disposal Facility

Post-Policy Management – Options

Option 2: Direct shipments from the school by a hauler as an SQG.

Option 3: Self-transport vape waste to an MRW facility (SQGs only).

Option 4: The school gets permitted as a MRW facility.

More in the Dangerous Waste Vape Management Options for Schools publication

Post-Policy Management – School Resource Officers & Law Enforcement

Myth: Give the vape devices to an officer for them to dispose it because they are excluded from the requirements.

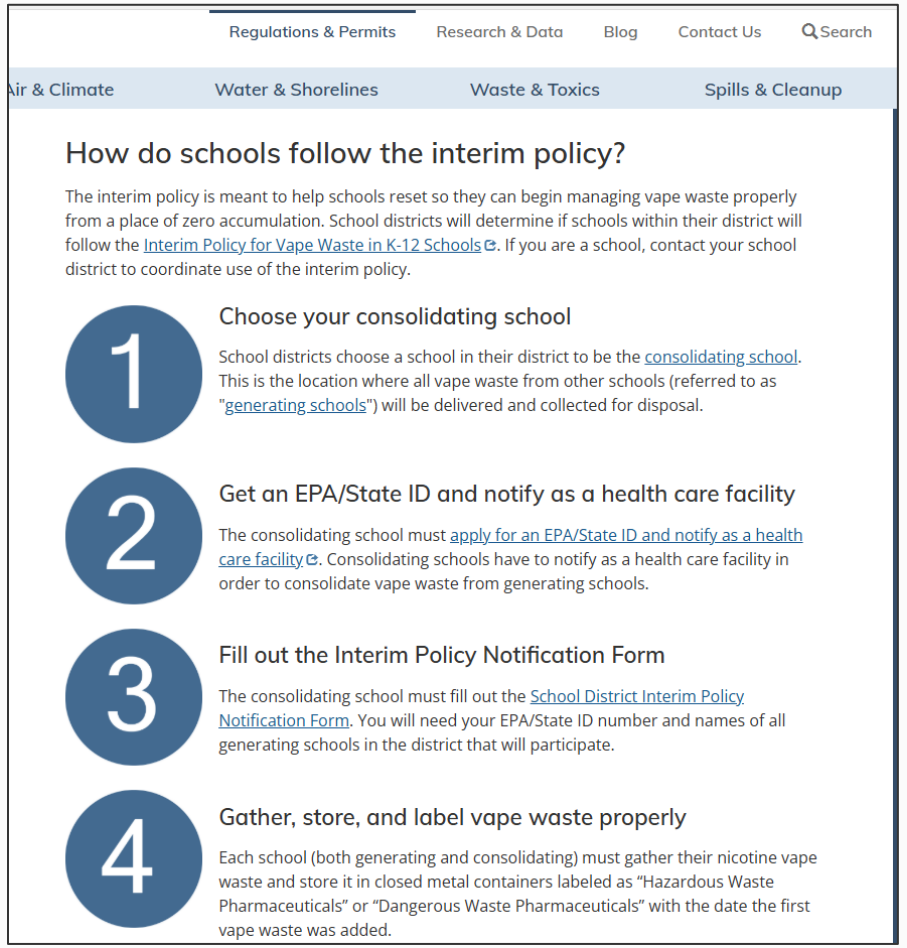
Reality: The conditional exclusion for Law Enforcement does not apply to nicotine vape devices.

- Only for waste-controlled substances with WA criteria waste codes removed from evidence rooms.

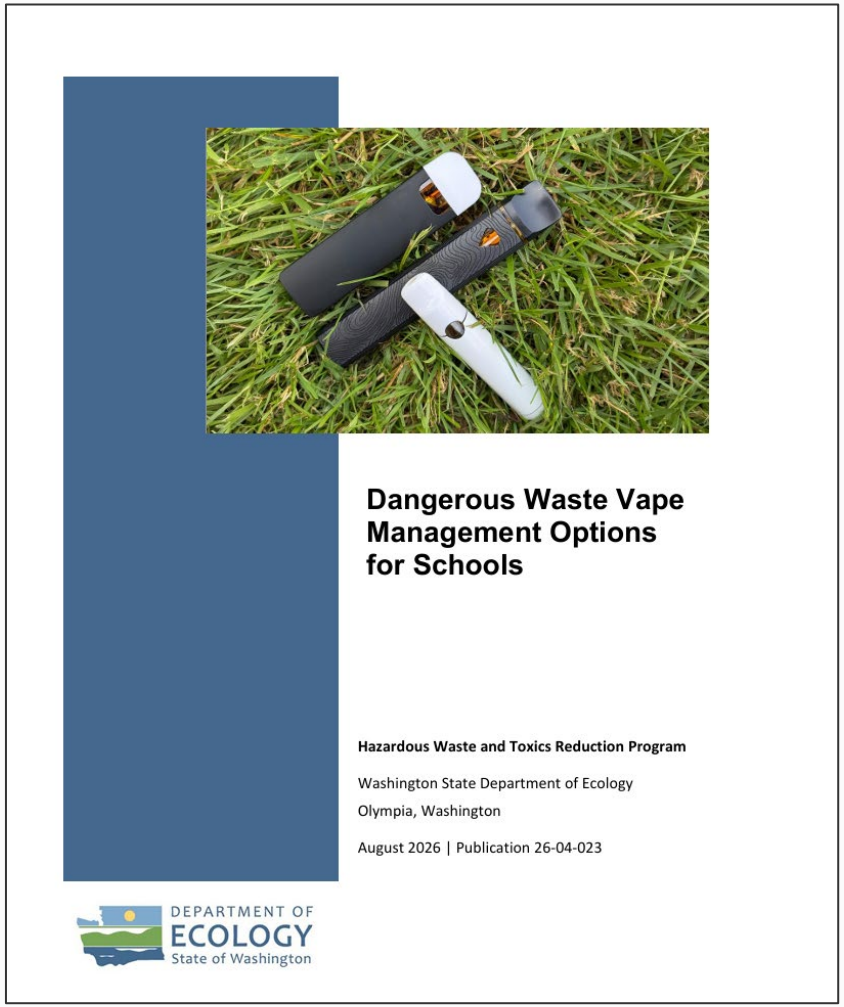
Guidance Materials

- Managing vape waste in K-12 schools

- Interim Policy for Vape Waste in K–12 Schools



Guidance Publications

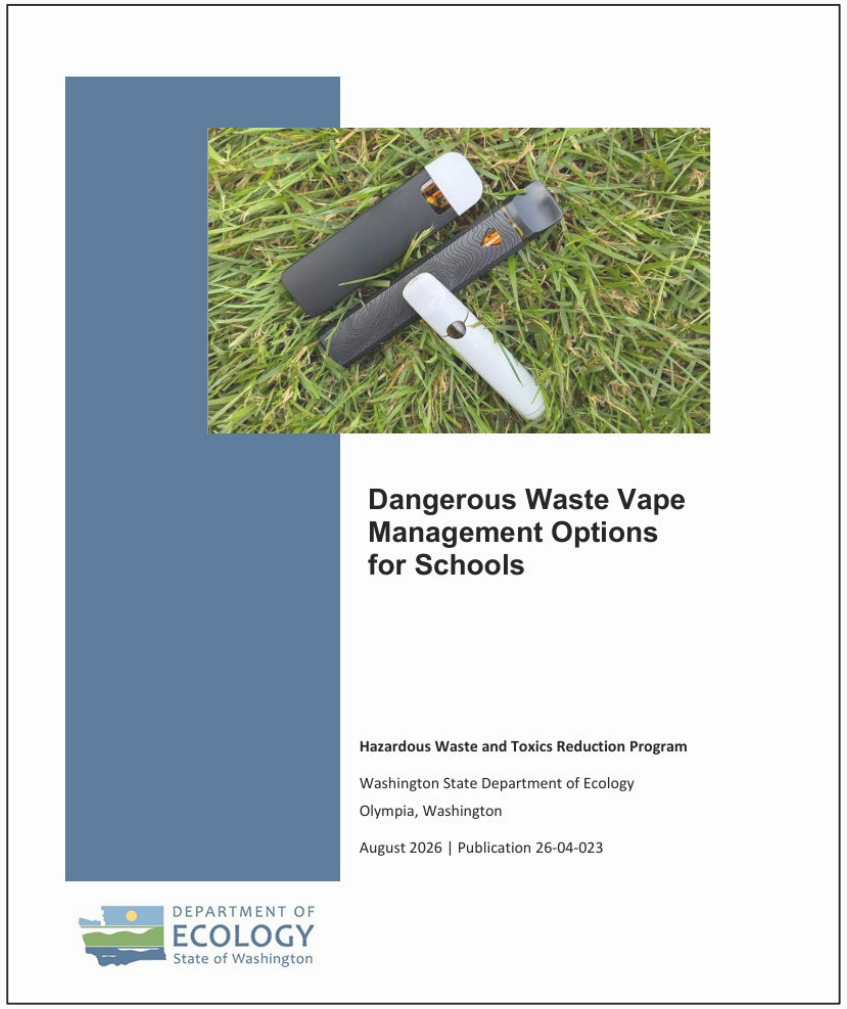


- How Schools Apply for an EPA/State ID Number and Notify as a Health Care Facility
- Dangerous Waste Vape Management Options for Schools

Extra Resources

- Waste Designation
- Washington State-only criteria waste designation
- Waste service providers
- Dangerous Waste Report
- Guide to Dangerous Waste by Generator Category

Final Thoughts



- Use the Interim Vape Policy if you have stockpiles of vape device wastes.
- Continue to use the same pathway for on-going disposal.
- Consolidate frequently
- Use the other options if they meet your waste generation needs.
- Contact us at Vapewaste@ecy.wa.gov

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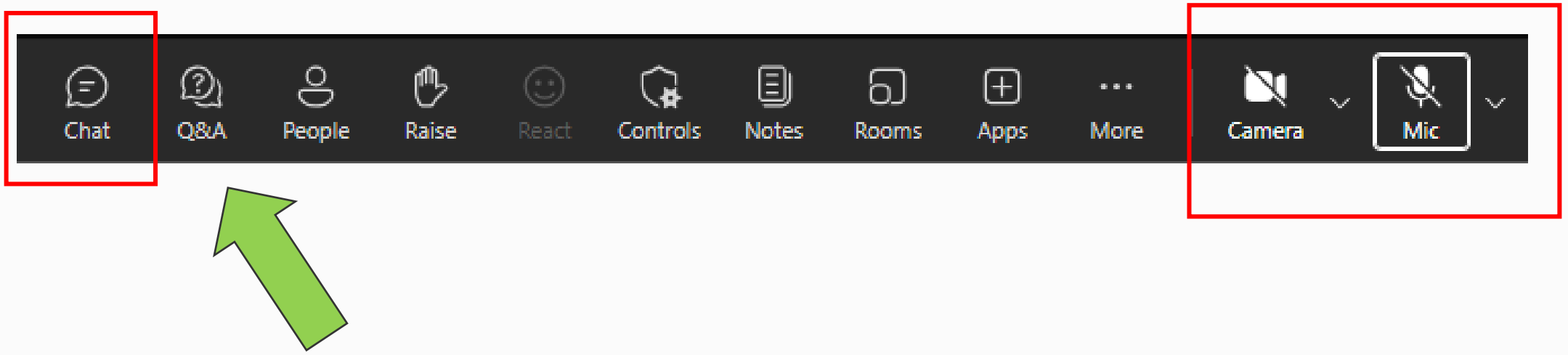

Thank you

- Managing vape waste in K-12 schools webpage
- Contact us at Vapewaste@ecy.wa.gov

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