






Fact Sheet

What Businesses Should Do With Expired Hand Sanitizer

Businesses, schools and other organizations across Oregon acquired large amounts of hand sanitizer during the COVID-19 pandemic. Much of that hand sanitizer is now expiring. Hand sanitizer generally has a high alcohol content making it an ignitable hazardous waste when discarded, according to the Resource Conservation and Recovery Act, or RCRA. When legitimately reclaimed or recycled, hand sanitizer is not regulated under RCRA as hazardous waste. This fact sheet outlines options for adequately managing expired hand sanitizer.



Prohibitions

-  **Do not pour expired hand sanitizer down the drain.** Clean Water Act regulations prohibit the discharge of ignitable hazardous waste.
-  **Do not put expired hand sanitizer in the garbage.** Regulated hazardous wastes may not go into the regular trash unless the generator is considered a household or very small quantity generator.
-  **Do not take expired hand sanitizer to a household hazardous waste collection site.** Household hazardous waste collection sites can take limited amounts of hazardous waste from household generators. Some facilities can also accept small quantities of hazardous waste from very small quantity generators — contact them first.

Background

Alcohol-based hand sanitizer typically contains at least 60 percent alcohol by volume. Because of this, waste hand sanitizer is a regulated hazardous waste that carries the D001 waste code for ignitability – its ability to catch fire. Expired hand sanitizer only becomes a waste when it cannot be used, reused, reclaimed, or recycled.



Just 28 gallons of waste hand sanitizer could make your business a regulated hazardous waste generator.



Options for disposal

The three options for disposing of waste hand sanitizer are recycling, using the episodic generation rule, or managing it as hazardous waste. Federal and state regulations require proper management, transportation, treatment and disposal of hazardous waste. The rules also establish basic management standards for hazardous waste generators. The amount of hazardous waste generated per month determines a generator's category and the applicable regulations. A facility is a small quantity generator if, in one month, it produces more than 220 pounds of hazardous waste, equivalent to about 28 gallons of hand sanitizer. SQGs must register with DEQ, report their waste and pay annual fees. Learn more about generator categories in [DEQ's Small Quantity Generator Handbook](#).

Summary of disposal options

| | Recycle the waste hand sanitizer | Use the episodic generation rule | Manage the hand sanitizer as hazardous waste |
|--------------------|--|---|---|
| Benefits | <ul style="list-style-type: none"> Waste is not subject to hazardous waste regulations. No DEQ fees. No annual report. Less paperwork - no shipping manifest or land disposal restriction paperwork is required. | <ul style="list-style-type: none"> No change to the generator's status. Can dispose of other hazardous waste simultaneously. | <ul style="list-style-type: none"> Ensures compliance with all rules and regulations. |
| Possible drawbacks | <ul style="list-style-type: none"> Finding a company to recycle the waste might be challenging. The generator must ensure that the recycling is legitimate. | <ul style="list-style-type: none"> Must pay all fees. Must file an annual report with DEQ. Must remove waste within 60 days. Only very small quantity generators and small quantity generators can use this option. | <ul style="list-style-type: none"> Must pay all fees. Must file an annual report with DEQ. Could change generator status. Must follow more stringent rules and regulations. |

Reclamation and recycling

One of Oregon's goals is to minimize waste generation whenever possible. Recycling hand sanitizer could involve various recovery processes to reclaim the alcohol from the hand sanitizer. Alcohol-based hand sanitizer is exempt from hazardous waste regulations when it is returned to the manufacturer or to a recycler who can reclaim the alcohol. In other words, legitimately recycled hand sanitizer is not regulated as hazardous waste and does not require a RCRA storage permit.

Businesses and organizations that store or recycle their waste hand sanitizer must provide appropriate documentation showing the waste hand sanitizer is legitimately recycled. The U.S. Environmental Protection Agency created [guidance](#) to help ask the right questions when selecting a recycler and DEQ has created a [form to document](#) legitimate recycling.

Episodic generation

Hand sanitizer disposal is possible under Oregon's episodic generation provisions. This rule allows very small quantity generators, also called VSQGs, and small quantity generators, SQGs, to maintain their generator category while producing more hazardous waste than is typical during normal operations if they meet certain conditions. Generators using this rule must notify DEQ 30 days in advance using the Site Identification Form on [Your DEQ Online](#) and send the episodic hazardous waste to a permitted hazardous waste facility within a set timeframe, among other conditions. Refer to DEQ's [episodic generation fact sheet](#) or contact your regional [Technical Assistance Specialist](#) with questions.

Disposal as a hazardous waste

If legitimate recycling, reclamation or use of the episodic generation provision isn't possible, then expired hand sanitizer must be disposed of as hazardous waste. Managing hand sanitizer as hazardous waste means sending the sanitizer to a permitted hazardous waste disposal facility, following all RCRA regulations, submitting an annual report to DEQ, paying all applicable fees, and meeting other requirements.

Pharmaceutical rule considerations

Hand sanitizer with a drug facts label, such as the one shown to the right, is a pharmaceutical waste when discarded. Healthcare facilities, including retailers or reverse distributors, must follow [40 Code of Federal Regulations Part 266 Subpart P](#) regulations to manage hazardous waste pharmaceuticals.

Organizations must manage hand sanitizer recalled by the Federal Drug Administration in an approved manner, which may include returning the product to the manufacturer or pharmacy for proper disposal.

Still have questions?

DEQ has made it easy to get your questions answered. To learn more and request free, non-regulatory technical assistance, visit DEQ's [Hazards and Cleanup page](#) online.

Submit forms to DEQ at YourDEQOnline.oregon.gov.

Alternate formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.oregon.gov.

DEQ puede proporcionar los documentos en un formato alternativo o en un idioma distinto al inglés si así lo solicita. Llame al DEQ al 800-452-4011 o envíe un correo electrónico a deqinfo@deq.oregon.gov

DEQ 可以根據要求提供另一種格式的文件或英語和西班牙語以外的語言。請致電 DEQ : 800-452-4011 或發送電子郵件至 : deqinfo@deq.oregon.gov.

ДЭК может предоставить документы в другом формате или на другом языке, помимо английского и испанского, по запросу. Позвоните в ДЭК по телефону 800-452-4011 или свяжитесь по электронной почте deqinfo@deq.oregon.gov.

Tùy theo yêu cầu, cơ quan DEQ có thể cung cấp các tài liệu ở định dạng thay thế hoặc bằng ngôn ngữ khác ngoài tiếng Anh và tiếng Tây Ban Nha. Liên hệ với DEQ theo số 800-452-4011 hoặc gửi email đến deqinfo@deq.oregon.gov

| Drug Facts | |
|---|------------------------------|
| Active Ingredient Isopropyl Alcohol 75% v/v | Purpose Antiseptic |
| Use[s] Hand sanitizer to help reduce bacteria that potentially can cause disease. For use when soap and water are not available. | |
| Warnings For external use only. Flammable. Keep away from heat or flame. | |
| Do not use <ul style="list-style-type: none">• in children less than 2 months of age• on open skin wounds | |
| When using this product keep out of eyes, ears, and mouth. In case of contact with eyes, rinse eyes thoroughly with water. | |
| Stop use and ask a doctor if irritation or rash occurs. These may be signs of a serious condition. | |
| Keep out of reach of children. If swallowed, get medical help or contact a Poison Control Center right away. | |
| Directions <ul style="list-style-type: none">• Place enough product on hands to cover all surfaces. Rub hands together until dry.• Supervise children under 6 years of age when using this product to avoid swallowing. | |
| Other information <ul style="list-style-type: none">• Store between 15-30C (59-86F)• Avoid freezing and excessive heat above 40C (104F) | |
| inactive ingredients glycerin, hydrogen peroxide, purified water USP | |
| Consolidated Chemicals, LLC, 3191 West Tharpe St., Tallahassee FL 32303 Ph: (850) 575-0321 | |