

NICOTINE RELATED HAZARDOUS WASTE & MANAGEMENT OF THE HAZARDOUS WASTE

Types of Nicotine Related Hazardous Waste

Under the Federal Resource Conservation and Recovery Act (RCRA) and the New Hampshire Department of Environmental Services (NHDES) Hazardous Waste Rules (ENV-Hw 100-1200), nicotine waste is a highly regulated acutely hazardous waste with special on-site management and disposal requirements. Disposing of residual nicotine liquid down the drain or disposing of wastes contaminated with nicotine as ordinary trash is prohibited. There is no minimal amount or concentration of nicotine-containing material that is exempt from regulation. The following are hazardous wastes:

- Expired, discontinued, damaged, confiscated, or otherwise unsellable nicotine solutions. This includes prepackaged e-liquid cartridges, pre-packaged e-liquid refill containers, “house blend” e-liquid (e-liquid mixed at the store from nicotine solutions), e-liquid, partially empty containers, and nicotine solutions.
- Empty containers of e-liquid, e-liquid cartridges, house blend containers, and nicotine solution. This includes waste from customers, employees, students, etc. that is disposed of at your facility. These must be managed as hazardous waste, because of the highly regulated nicotine residue remaining in the empty containers.
- Rinse or wash water from cleaning out containers, cartridges, glassware, and tools that were in contact with nicotine solutions or e-liquid and may NOT be discharged to sewer or septic systems.
- Cleanup materials (rags, towels, absorbents, etc.), gloves, and other protective equipment contaminated by nicotine solution.
- Spent e-cigarette heating coils, if not managed as scarp metal (could contain regulated chromium).
- Spent e-cigarette batteries, if not recycled (could contain regulated metals or reactive lithium)

Management of Hazardous Waste

Vaping devices and liquids containing nicotine need to be managed as a hazardous waste. If a school is in possession of vaping devices or e-cigarettes that have been confiscated or left at the school, they should work with their hazardous waste transporter to properly dispose/recycle these devices just like they would other hazardous waste that is generated at the school and follow NH Hazardous Waste Regulations. It is illegal to dispose of these materials with the regular trash. Alternatively, if the school has a resource officer that immediately takes ownership of the confiscated vaping devices or e-cigarettes for potential enforcement cases, those materials must be disposed of properly through the local police department after their investigation is complete.