

Dealing with Unwanted, Expired or Recalled Hand Sanitizer for Iowa Businesses



Businesses, schools and other organizations across Iowa acquired large amounts of hand sanitizer during the COVID-19 pandemic. Much of that hand sanitizer is now expiring. Businesses are scaling back its use as the pandemic subsides, or they've simply purchased more sanitizer than they can use. Furthermore, some hand sanitizer has been recalled and must be properly disposed. The Food and Drug Administration (FDA) has cited a number of companies for selling hand sanitizers that contain methanol or 1-propanol, both have toxic skin effects, thus neither are approved for handwashing. To see a list of recalled or banned brands and products, visit the [FDA website](#).

During the beginning of the COVID pandemic, policies were implemented to allow non-drug manufacturers (such as breweries) to produce hand sanitizer to help meet demand. On October 13, 2021, the FDA withdrew temporary policies on alcohol-based hand sanitizer production and distribution. Effective December 31, 2021, companies manufacturing alcohol-based hand sanitizers under the temporary policies had to cease production. Hand sanitizers manufactured under the temporary guidance prior to that date could no longer be sold or distributed after March 31, 2022.

Hand sanitizer also has special storage requirements. Most hand-sanitizing liquids & gels are classified as [Class 3 Flammable Liquids](#) as they're 60-to-95 percent ethyl or isopropyl alcohol. The Occupational Safety and Health Administration (OSHA) regulations stipulate that any accumulation of 25 gallons or more must be maintained in a flammable-liquid storage cabinet, even if it's in multiple small containers and states that hand sanitizers cannot be stored in office buildings at all. Due to its high alcohol content, according to the Resource Conservation and Recovery Act (RCRA), it is regulated hazardous waste that carries the D001 waste code for ignitability, making it an ignitable hazardous waste when discarded. If about 50 gallons of alcohol-based sanitizer is poured down the drain, it'll be introducing enough flammable-vapor generating liquid into the local sewer to cause an explosion!

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

DISPOSAL OPTIONS FOR EXCESS OR EXPIRED SANITIZER FOR BUSINESSES

1. RECYCLE THE WASTE HAND SANITIZER

Note: The generator must ensure that the recycling is [legitimate](#). The U.S. Environmental Protection Agency (EPA) created [guidance](#) to help ask the right questions when selecting a recycler. Expired hand sanitizer only becomes a waste when it cannot be used, reused, reclaimed, or recycled. Keep in mind that it still must be stored in compliance with all state and federal regulations.

- a) **Reuse** - Contact the [Iowa Waste Exchange](#) (IWE) for possible reuse options. The IWE is designed to keep waste out of landfills and in production. Many industry, business and even local governments dispose of items others can use. IWE representatives are available to help anyone who is looking for a

specific item or has items they are willing to give away. Note that reuse of excess sanitizer has been a challenge due to expired product and simply a lot of it available.

- b) **Very small quantities** - If your business is a [Very Small Quantity Generator](#) (VSQG) of hazardous waste and has a *small* amount of sanitizer to dispose of, contact your local [Regional Collection Center](#). Regional Collection Centers (RCCs) are permanent collection facilities designed to assist the public and very small quantity generator (VSQG) businesses with proper management and disposal of household hazardous materials and hazardous waste. RCC programs allow households and businesses (for a fee) to safely manage hazardous materials they may have, minimizing the product's impact on the environment and improving the health and safety of homes and businesses.
- c) **Legitimately recycle hand sanitizer** (e.g., by reclaiming the alcohol) - When legitimately reclaimed or recycled, hand sanitizer is not regulated under RCRA as hazardous waste. Under [§261.2](#), the sanitizer would be considered a commercial chemical product being sent for reclamation. A business can also use a fuel blending process to recover the alcohol from the hand sanitizer, transforming the waste to a gas fuel additive product. Keep in mind that all recycling must be done in compliance with [§260.43](#), the legitimate recycling regulations. The [EPA Region 7](#) administers the hazardous waste program for Iowa.

2. THE EPISODIC GENERATION FEDERAL RULE -

Hand sanitizer disposal is possible under the EPA's episodic generation provisions in [40 CFR 262 Subpart L](#). This rule allows very small quantity generators (VSQGs) and small quantity generators (SQGs), to maintain their generator category while producing more hazardous waste than is typical during normal operations as long as they meet certain conditions. Generators using this rule must notify EPA Region 7, sixty (60) days in advance using the [Site Identification Form 8700-12](#), and send the episodic hazardous waste to a permitted hazardous waste facility (not an RCC) within a set timeframe, among other conditions.

The EPA maintains a webpage titled, "[Frequent Questions](#) About Implementing the Hazardous Waste Generator Improvements Final Rule". Once the webpage is accessed, click on the "Episodic Generation" hyperlink shown on this page. The information will assist in a determination as to whether the facility qualifies for the Alternative Standards for Episodic Generation found at Title 40 Code of Federal Regulations (40 CFR) § 262 Subpart L (40 CFR 262.230 through 40 CFR 262.233).

Whether the facility qualifies under the alternative episodic generation requirements for hazardous waste found at 40 CFR § 262 Subpart L, the facility is still required to provide notification under the Resource Conservation and Recovery Act (RCRA). This notification is necessary if the facility is an episodic generator, or Large Quantity Generator (LQG) or Small Quantity Generator (SQG) of hazardous waste.

3. MANAGE THE HAND SANITIZER AS 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.

FEES: There may be fees involved depending on the business's disposal method and generator status. Section [455B.424 of the Iowa Code](#) requires small and large quantity generators and anyone that treats, stores, disposes of or transports hazardous waste in



Iowa to complete the enclosed Hazardous Waste Fee Form and pay the appropriate fee. Information on the hazardous waste fee can be found on the [DNR website](#).

4. 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.

| 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 • 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 • 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 • Store between 15-30C (59-86F) • Avoid freezing and excessive heat above 40C (104F) | |
| Inactive ingredients glycerin, hydrogen peroxide, purified water USP | |

PROHIBITIONS:



Do not pour expired hand sanitizer down the drain. Clean Water Act regulations prohibit the discharge of what would otherwise be an 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.



Do not take expired hand sanitizer to a household hazardous waste collection site, unless you have a *small amount*. Household hazardous waste collection sites can take limited amounts of hazardous waste from small businesses who are very small quantity generators and from household generators-[contact](#) them first.



** Disposal options may depend on the business generator status. Learn more about generator categories, episodic generation and helpful tips in [EPA's guidance document](#) for managing hazardous waste.