

# **Waste Management and other EH&S Requirements that may Apply to Renovation, Repair & Painting Activities**



# Brought to You By...



- ➔ Ross Bunnell, Sanitary Engr.  
Connecticut DEP  
Waste Engineering &  
Enforcement Division
- ➔ (860) 424-3274  
[ross.bunnell@ct.gov](mailto:ross.bunnell@ct.gov)
- ➔ WEED COMPASS line:  
1-888-424-4193

# Types of Wastes

## ⇒ Architectural Debris

- Doors, windows, siding, trim, plaster, flooring, etc.

## ⇒ Paint Stripping Wastes

## ⇒ Encapsulation Wastes

## ⇒ Cleanup Wastes

- HEPA vacuum contents and filters.
- PPE, plastic sheeting, tyvek suits, etc.
- Contaminated Soil

## ⇒ Wastewaters



# Regulated Contaminants

## ⇒ Lead

- Paint
- Glazing compound in windows
- Metallic lead (flashing, stained glass solder)



## ⇒ Other metals (pigments, etc.)

## ⇒ Chemicals

- Paint strippers, encapsulants, re-painting wastes.

## ⇒ Asbestos\*



# Lead



- ⇒ Hazardous Waste if 5.0 mg/l or more by TCLP.\*
  - Manifest, permitted transporter & receiving facility.
  - Must comply with HW generator requirements while stored on-site.
- ⇒ Metallic Lead exempt if recycled as scrap metal.
- ⇒ Ordinary Solid Waste if less than 5.0 mg/l.\*\*
  - Can go to a construction & demolition (C&D) waste landfill.
  - No manifest or DEP authorization required.



# Other Metals & Chemicals

- ⇒ Some may be “ignitable” HW.....(D001)
- ⇒ Some may be “corrosive” HW.....(D002)
- ⇒ Some may be “toxic” HW.....(D004 – D043)
  - Other metals (As, Ba, Cd, Cr, Hg, Se, Ag)
  - Solvents (MEK, PCE, TCE)
- ⇒ Some may be “listed” HW.....(F001 – F005)
- ⇒ If not HW, could still be “CT Regulated Wastes” (regulated under CGS 22a-454).
  - Permitted transporter and disposal facility required.
  - No manifest or generator requirements.

# Asbestos

⇒ Some wastes can contain asbestos:

- Windows (glazing compound).
- Plaster
- Siding
- Pipe, boiler, tank insulation.



⇒ Regulated as “Special Waste.”

- Dispose of at an in-state landfill that is pre-approved to accept asbestos.

- OR -

- Dispose at out-of-state facility that is authorized to accept asbestos containing materials.

# Sampling & Analysis of Wastes

## ⇒ Architectural Debris:

- “Screen, Sample, and Segregate” method.
- “Screen and Segregate” method.
- “Composite-Sample and Demolish” method.
- “Remove, Cut, and Sample” method.
- “Screen and Calculate” method.
- “Demolish and Test” method.
- Guidance available on all the above methods at [www.ct.gov/dep/constructioncontractors](http://www.ct.gov/dep/constructioncontractors).





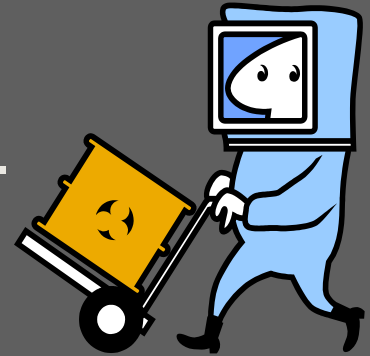
# Sampling & Analysis (Cont.)

- ⇒ Other wastes:
  - Representative sample.
- ⇒ In general, lab testing must:
  - Be done by DPH certified lab (listed on DPH web site).
  - Use EPA approved methods.



# On-Site Handling Requirements

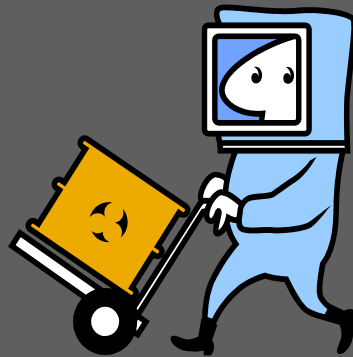
- ⇒ Solid Waste, Special Waste & CRW: none.
- ⇒ HW: depends on amount of waste generated.
  - 3 generator categories: CESQG, SQG, LQG.\*
- ⇒ SQGs and LQGs:
  - Permitted Transporter and Disposal Facility.
  - Closed, DOT-approved storage containers.
  - Marking, dating of containers.
  - Secondary containment for wastes w/ free liquids.
  - Inspection, training, emergency preparedness.
  - HW Manifest.



# On-Site Handling Requirements (Cont.)

⇒ CESQGs:

- Permitted Transporter and Disposal Facility.
- Can self-transport to a Household Hazardous Waste Collection Facility or Event (pre-approval required).



# Storage Time Limits

- ⇒ Hazardous Waste:
  - CESQGs: No Limit.
  - LQGs: 90 days.
  - SQGs: 180 days.
- ⇒ CT-Regulated Waste: No Limit.
- ⇒ Solid Waste: 45 Days.



# Household HW Exclusion



⇒ HW Rules do not apply if:

- Homeowners are doing the work themselves.
- Renovation or abatement only (not demolition).
- Less than 10 cubic yards of waste.
- Legitimate disposal outlet (local HHW collection or local transfer station will take it).

⇒ If contractor is involved, HW rules generally apply.\*

⇒ A change to the above is in the works.

# Renovation & Demolition Flyer

- ⇒ Developed by LRAWG.
- ⇒ Info on many different EH&S requirements.
- ⇒ Web links and telephone numbers for more info.
- ⇒ Aimed at property owners, developers, contractors, consultants, engineers, architects, etc.
- ⇒ Also useful info for local officials, to hand out in the field, or for office display.



# “Red Flag List”

- ⇒ Developed as a companion to the Flyer specifically for local officials.
- ⇒ “If you see ... please call” table.
- ⇒ Telephone numbers of the agencies to contact.
- ⇒ Brief descriptions of the main issues (more info in Flyer).



# Other Information Resources

- ⇒ Lead testing and disposal guidance manual (discussed earlier).
- ⇒ Lead disposal fact sheet (aimed at homeowners and small contractors).
- ⇒ “Strategies for Success.”
- ⇒ Sample Renovation & Demolition Checklist.
- ⇒ “Tips for Paint Removal.”



# How to Get Copies of Guidance Documents

- ⇒ Available electronically:
  - Email me at [ross.bunnell@ct.gov](mailto:ross.bunnell@ct.gov) .
- ⇒ Hardcopies available by regular mail.
- ⇒ Most are on DEP Website at:  
[www.ct.gov/dep/constructioncontractors](http://www.ct.gov/dep/constructioncontractors) .



**Questions?**

