

Waste Management Requirements for Lead Abatement, Renovation, Repair & Painting Activities



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About Your Presenter



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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, Tyvek suits, plastic sheeting, etc.
 - Contaminated Soil
- Wastewaters
 - Decon of personnel, PPE, etc.
 - Power-washing 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.
- 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.
- Metallic Lead exempt if recycled as scrap metal.
- Reused items (architectural salvage, etc.) are not regulated if legitimately reused.

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 (e.g., MEK, PCE, TCE)
- Some may be “listed” HW.....(F001 – F005)
 - Solvents (e.g., methylene chloride, xylene, acetone).
- 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 facility that is authorized to accept asbestos.
 - Currently have one transfer station in Portland and one landfill in Manchester (non-friable only).
 - Dispose at out-of-state facility that is authorized to accept asbestos containing materials.
 - Requirements vary from state to state.



Sampling & Analysis of Wastes

- Methods for non-debris wastes:
 - Representative sample.
- Methods for 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/deep/constructioncontractors.



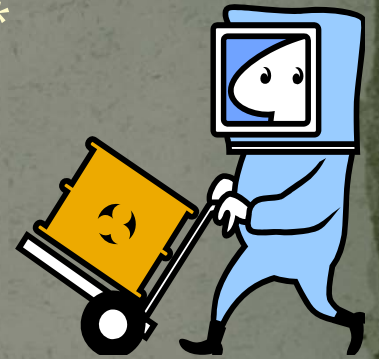
Sampling & Analysis (Cont.)

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



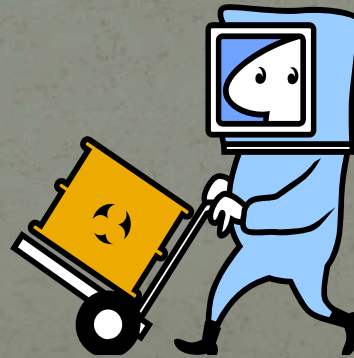
On-Site Handling Requirements

- Solid Waste, Special Waste & CRW: none.
- HW: depends on amount of waste generated.
 - 3 generator categories: CESQG, SQG, LQG.*
- SQGs and LQGs:
 - Ship using a HW Manifest.
 - 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.



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).
 - Information and forms available at www.ct.gov/deep/hhw.



Storage Time Limits

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



Household HW Exclusion



- DEEP has not adopted EPA Guidance of 7/31/2000.
- 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.*
 - Exception: if homeowner agrees to accept responsibility for waste, and disposes of it using locally-available options (e.g., town transfer station).
 - DEEP suggests that the agreement be in writing.

Renovation & Demolition Flyer

- A joint effort by DEEP, DPH and stakeholders.
- Info on many different EH&S requirements that may apply to reno & demo activities.
- 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).
- “Tips for Paint Removal.”
- www.ct.gov/deep/constructioncontractors
- www.ct.gov/deep/hazardouswaste

How to Get Copies of Guidance Documents

- Available electronically:
 - Email me at ross.bunnell@ct.gov.
 - Allows you to print copies yourself.
- Hardcopies available by regular mail.
 - Office displays, handouts in the field.



Questions?

